

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 26, 2000

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Serial No. 00-226
NL&OS/GDM R0
Docket Nos. 50-280, 281
50-338, 339
License Nos. DPR-32, 37
NPF-4, 7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
REQUEST FOR APPROVAL - CODE CASE N-532

In an October 12, 1999 letter (Serial No. 99-381), Virginia Electric and Power Company requested the use of Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," for North Anna and Surry Power Stations Units 1 & 2. This code case is currently not endorsed by Regulatory Guide 1.147 (Revision 12).

In a March 6, 2000 telephone conference call with the NRC staff, the implementation of Code Case N-532, including the actions that constitute corrective measures necessary to bring a component back into conformance with Section XI criteria, was discussed. Based on this discussion, it was determined that Code required activities such as repair, replacement, and evaluation would be applicable to Code Case N-532, paragraph 2(c). The attachment provides the revised request to use Code Case N-532, and includes revision bars in the right hand margin of the document to identify the two changes from our previous submittal. Please use the revised request in the attachment to complete your review.

Approval to use Code Case N-532 is being requested as an alternative to Code requirements since it would provide an acceptable level of quality and safety consistent with 10 CFR 50.55a(a)(3)(i).

If you have any questions or comments, please contact us.

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering and Services



Commitments contained in this letter: None

Attachments

cc: U.S. Nuclear Regulatory Commission
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Mr. R. A. Musser
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ATTACHMENT 1

REQUEST TO USE CODE CASE N-532 NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2

I. Identification of Components

Pressure retaining components that are Class 1, 2 or 3 and piping of high safety significance as defined in the Surry Unit 1 risk-informed inservice inspection program.

II. Current Code Requirements

North Anna Unit 1 is currently completing the second inspection interval using the 1983 Edition with the Summer 1983 Addenda of ASME Section XI. It has started the third interval using the 1989 Edition of ASME Section XI. North Anna Unit 2 is currently completing the second inspection interval using the 1986 Edition of ASME Section XI. Surry Units 1 and 2 are currently in the second period of the third inspection interval and both are using the 1989 Edition of ASME Section XI. Surry Unit 1 has an approved risk-informed inservice inspection program for piping, which has committed it to reporting high safety significant piping regardless of code classification in addition to the Code requirements. Each of these programs currently report ASME Section XI repairs, replacements, and inservice inspections in accordance with IWA-4000, IWA-6000 and IWA-7000 with the exception of the Surry Unit 1 risk-informed program mentioned above.

III. Basis for Request

Code Case N-532 provides alternative reporting requirements that effectively reduce the administrative burden placed upon a nuclear unit by current Code requirements. These reports are currently required within 90 days following completion of a refueling outage. The alternative provided by Code Case N-532 extends reporting requirements to a period basis, or three times in ten years. Additionally, the alternative reporting only requires a summary of the interval inspection status and significant events to allow more effective reporting.

The use of Code Case N-532 was previously approved by the NRC for Wolf Creek Generating Station in a letter dated February 9, 1996. The safety evaluation included in the NRC approval letter noted a clarification to the term "corrective measures." It was noted that one use of the term involves Code required activities such as repair and replacement. The other use of the term involves maintenance activities such as tightening threaded fittings to eliminate leakage, torquing of fasteners to eliminate leakage at bolted connections,

replacing valve packing due to unacceptable packing leakage, tightening loosened mechanical connections on supports, adjustment and realignment of supports, cleanup of corrosion on components from leakage, etc. It is our intent to use the same clarification proposed and accepted for Wolf Creek Generating Station, that is, the above first use of the term "corrective measures," and not the second dealing with maintenance activities. Thus, all corrective measures that are necessary to bring a component back into conformance with Section XI criteria shall be documented and reported. Code required activities such as repair, replacement, and evaluation would be applicable to Code Case N-532 paragraph 2(c).

IV. Alternative Proposed

Apply Code Case N-532 with the corrective measure clarification as noted above, to the North Anna Unit 1 second and third inspection intervals, the North Anna Unit 2 second inspection interval, the Surry Units 1 and 2 third inspection intervals and the Surry Unit 1 risk-informed inservice inspection program for piping.