

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 27, 2000

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

Serial No. 00-469
NL&OS/GDM R1'
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 RELIEF FROM ASME CODE REQUIREMENTS

Pursuant to 10 CFR 50.55a(a)(3)(i), North Anna and Surry Power Stations Units 1 & 2 propose an alternative to the qualification and certification of VT-2 visual examiners requirements established by ASME Section XI, paragraph IWA-2300 for the remainder of the current inspection interval. The use of the proposed alternative will continue to provide an acceptable level of quality and safety, while facilitating the qualification of those personnel most familiar with the walkdown of plant systems.

The proposed alternative and the basis for alternative for North Anna Units 1 and 2 and Surry Units 1 and 2 are provided in Attachments 1 and 2, respectively. By a letter dated September 18, 1998, the NRC approved a similar relief request for Detroit Edison's Fermi 2 plant.

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

A047

cc: U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Mr. M. J. Morgan
NRC Senior Resident Inspector
North Anna Power Station

Mr. R. Smith
Authorized Nuclear Inspector
Surry Power Station

Mr. M. Grace
Authorized Nuclear Inspector
North Anna Power Station

**Proposed Alternative
ASME Section XI Paragraph 2300
Qualification and Certification of VT-2 Inspectors**

**Virginia Electric & Power Company
North Anna Power Station Units 1 and 2**

**Virginia Electric & Power Company
North Anna Power Station Unit 1
Third Interval for Class 1, 2, and 3 Components
First Interval for Class MC and CC Components**

I. IDENTIFICATION OF COMPONENTS

Class 1, 2, and 3 pressure retaining piping and components and Class MC and CC containment components

II. IMPRACTICAL CODE REQUIREMENTS

Section XI, the 1989 Edition (Class 1, 2, and 3 only), and the 1992 Edition with 1992 Addenda (Class MC and CC only), IWA-2300 with regard to qualification and certification of VT-2 visual examiners.

III. BASIS FOR RELIEF REQUEST

The VT-2 visual examination requires no special knowledge of technical principles. It is simply an inspection for evidence of leakage. No special skills or training are necessary in order to observe water dripping from a component or bubbles forming on the surface wetted with a leak detection solution.

Code Case N-546 (attached), "Alternative Requirements for Qualification of VT-2 Examination Personnel," has been approved by the ASME as an acceptable alternative to the requirements of IWA-2300 in ASME Section XI. In accordance with 10 CFR 50.55a(a)(3)i the use of the Code Case is viewed by our organization as providing an acceptable level of quality and safety, while facilitating the qualification of those personnel most familiar with the walkdown of plant systems.

IV. ALTERNATE PROVISIONS

As an alternative to the Code requirements the following is proposed:

The requirements of Code Case N-546 shall be followed (Note: the vision test requirements of IWA-2321 in the Code Case references the 1995 Edition of ASME Section XI. Our vision test program references the 1992 Edition with the 1992 Addenda, however the paragraphs in each edition are identical.)

Additionally, the following provisions will be made:

- 1) Procedural guidelines for obtaining consistent quality VT-2 visual examinations,
- 2) Documentation and records to verify the qualification of persons selected to perform VT-2 visual examinations, and

3) Implementation of independent review and evaluation of detected leakage by persons other than those that performed the VT-2 visual examinations.

V. IMPLEMENTATION SCHEDULE

This alternative to Code requirements will be followed upon receiving NRC approval for the remainder of the third inspection interval for Class 1, 2, and 3 piping and components, and the remainder of the first inspection interval for Class MC and Class CC containment components.

By a letter dated September 18, 1998 the NRR approved a similar relief request for Detroit Edison's Fermi 2 plant.

**Virginia Electric & Power Company
North Anna Power Station Unit 2
Second Interval for Class 1, 2, and 3 Components
First Interval for Class MC and CC Components**

I. IDENTIFICATION OF COMPONENTS

Class 1, 2, and 3 pressure retaining piping and components and Class MC and CC containment components

II. IMPRACTICAL CODE REQUIREMENTS

Section XI, the 1986 Edition (Class 1, 2, and 3 only), and the 1992 Edition with 1992 Addenda (Class MC and CC only), IWA-2300 with regard to qualification and certification of VT-2 visual examiners.

III. BASIS FOR RELIEF REQUEST

The VT-2 visual examination requires no special knowledge of technical principles. It is simply an inspection for evidence of leakage. No special skills or training are necessary in order to observe water dripping from a component or bubbles forming on the surface wetted with a leak detection solution.

Code Case N-546 (attached), "Alternative Requirements for Qualification of VT-2 Examination Personnel," has been approved by the ASME as an acceptable alternative to the requirements of IWA-2300 in ASME Section XI. In accordance with 10 CFR 50.55a(a)(3)i the use of the Code Case is viewed by our organization as providing an acceptable level of quality and safety, while facilitating the qualification of those personnel most familiar with the walkdown of plant systems.

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Additionally, the following provisions will be made:

- 1) Procedural guidelines for obtaining consistent quality VT-2 visual examinations,
- 2) Documentation and records to verify the qualification of persons selected to perform VT-2 visual examinations, and

3) Implementation of independent review and evaluation of detected leakage by persons other than those that performed the VT-2 visual examinations.

V. IMPLEMENTATION SCHEDULE

This alternative to Code requirements will be followed upon receiving NRC approval for the remainder of the second inspection interval for Class 1, 2, and 3 piping and components, and the remainder of the first inspection interval for Class MC and Class CC containment components.

By a letter dated September 18, 1998 the NRR approved a similar relief request for Detroit Edison's Fermi 2 plant.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: August 24, 1995

*See Numeric Index for expiration
and any reaffirmation dates.*

Case N-546

**Alternative Requirements for Qualification of
VT-2 Examination Personnel
Section XI, Division 1**

Inquiry: What alternative to the requirements of IWA-2300 may be used for qualification of VT-2 visual examination personnel?

Reply: It is the opinion of the Committee that VT-2 visual examination personnel need not be qualified nor certified to comparable levels of competence in accordance with the referenced standard (i.e., ANSI

N45.2.6, ASNT SNT-TC-1A, or ASNT CP-189) provided the examination personnel are qualified in accordance with the following requirements.

(a) At least 40 hr plant walkdown experience, such as that gained by licensed and nonlicensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel.

(b) At least 4 hr of training on Section XI requirements and plant specific procedures for VT-2 visual examination.

(c) Vision test requirements of IWA-2321, 1995 Edition.

**Proposed Alternative
ASME Section XI Paragraph 2300
Qualification and Certification of VT-2 Inspectors**

**Virginia Electric & Power Company
Surry Power Station Units 1 and 2**

**Virginia Electric & Power Company
Surry Power Station Unit 1
Third Interval for Class 1, 2, and 3 Components
First Interval for Class MC and CC Components**

I. IDENTIFICATION OF COMPONENTS

Class 1, 2, and 3 pressure retaining piping and components and Class MC and CC containment components

II. IMPRACTICAL CODE REQUIREMENTS

Section XI, the 1989 Edition (Class 1, 2, and 3 only), and the 1992 Edition with 1992 Addenda (Class MC and CC only), IWA-2300 with regard to qualification and certification of VT-2 visual examiners.

III. BASIS FOR RELIEF REQUEST

The VT-2 visual examination requires no special knowledge of technical principles. It is simply an inspection for evidence of leakage. No special skills or training are necessary in order to observe water dripping from a component or bubbles forming on the surface wetted with a leak detection solution.

Code Case N-546 (attached), "Alternative Requirements for Qualification of VT-2 Examination Personnel," has been approved by the ASME as an acceptable alternative to the requirements of IWA-2300 in ASME Section XI. In accordance with 10 CFR 50.55a(a)(3)i the use of the Code Case is viewed by our organization as providing an acceptable level of quality and safety, while facilitating the qualification of those personnel most familiar with the walkdown of plant systems.

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Additionally, the following provisions will be made:

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- 2) Documentation and records to verify the qualification of persons selected to perform VT-2 visual examinations, and

3) Implementation of independent review and evaluation of detected leakage by persons other than those that performed the VT-2 visual examinations.

V. IMPLEMENTATION SCHEDULE

This alternative to Code requirements will be followed upon receiving NRC approval for the remainder of the third inspection interval for Class 1, 2, and 3 piping and components, and the remainder of the first inspection interval for Class MC and Class CC containment components.

By a letter dated September 18, 1998 the NRR approved a similar relief request for Detroit Edison's Fermi 2 plant.

**Virginia Electric & Power Company
Surry Power Station Unit 2
Third Interval for Class 1, 2, and 3 Components
First Interval for Class MC and CC Components**

I. IDENTIFICATION OF COMPONENTS

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(a) At least 40 hr plant walkdown experience, such as that gained by licensed and nonlicensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel.

(b) At least 4 hr of training on Section XI requirements and plant specific procedures for VT-2 visual examination.

(c) Vision test requirements of IWA-2321, 1995 Edition.