

November 21, 2000

Mr. David A. Christian  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

SUBJECT: NORTH ANNA POWER STATION, UNIT 2, RE: SECOND 10-YEAR INTERVAL  
INSERVICE INSPECTION PROGRAM PLAN FOR RELIEF REQUESTS NDE-043,  
NDE-044, AND NDE-045 (TAC NO. MA8833)

Dear Mr. Christian:

This letter grants the reliefs you requested for NDE-043, NDE-044, and NDE-045 for North Anna Power Station, Unit 2.

By letter dated April 24, 2000, as supplemented July 21, 2000, Virginia Electric and Power Company (VEPCO) proposed relief requests NDE-043, NDE-044, and NDE-045 to obtain relief from Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Interferences and weld geometry had prevented the complete examination of the inspected welds.

Our evaluations and conclusions are contained in the enclosed Safety Evaluation. The staff has concluded that the requirements of Section XI of the ASME Code are impractical for the subject welds and reasonable assurance of structural integrity is provided by the completed examinations. Your request to use relief requests NDE-043, NDE-044, and NDE-045 is authorized pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.55a(g)(6)(i) for the second 10-year inservice inspection program.

The staff has completed its evaluation of these requests; therefore, we are closing TAC No. MA8833.

Sincerely,

**/RA/**

Richard L. Emch, Jr., Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-339

Enclosure: As stated

cc w/encl: See next page

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Our evaluations and conclusions are contained in the enclosed Safety Evaluation. The staff has concluded that the requirements of Section XI of the ASME Code are impractical for the subject welds and reasonable assurance of structural integrity is provided by the completed examinations. Your request to use relief requests NDE-043, NDE-044, and NDE-045 is authorized pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.55a(g)(6)(i) for the second 10-year inservice inspection program.

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Mr. David A. Christian  
Virginia Electric and Power Company

cc:

Mr. Donald P. Irwin, Esq.  
Hunton and Williams  
Riverfront Plaza, East Tower  
951 E. Byrd Street  
Richmond, Virginia 23219

Mr. E. S. Grecheck  
Site Vice President  
Surry Power Station  
Virginia Electric and Power Company  
5570 Hog Island Road  
Surry, Virginia 23883

Senior Resident Inspector  
Surry Power Station  
U. S. Nuclear Regulatory Commission  
5850 Hog Island Road  
Surry, Virginia 23883

Chairman  
Board of Supervisors of Surry County  
Surry County Courthouse  
Surry, Virginia 23683

Dr. W. T. Lough  
Virginia State Corporation  
Commission  
Division of Energy Regulation  
P. O. Box 1197  
Richmond, Virginia 23209

Robert B. Strobe, M.D., M.P.H.  
State Health Commissioner  
Office of the Commissioner  
Virginia Department of Health  
P.O. Box 2448  
Richmond, Virginia 23218

Office of the Attorney General  
Commonwealth of Virginia  
900 East Main Street  
Richmond, Virginia 23219

Mr. J. H. McCarthy, Manager  
Nuclear Licensing & Operations  
Support  
Innsbrook Technical Center  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

Mr. W. R. Matthews  
Site Vice President  
North Anna Power Station  
Virginia Electric and Power Company  
P. O. Box 402  
Mineral, Virginia 23117

Mr. C. Lee Lintecum  
County Administrator  
Louisa County  
P.O. Box 160  
Louisa, Virginia 23093

Old Dominion Electric Cooperative  
4201 Dominion Blvd.  
Glen Allen, Virginia 23060

Senior Resident Manager  
North Anna Power Station  
U.S. Nuclear Regulatory Commission  
1024 Haley Drive  
Mineral, Virginia 23117

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SECOND 10-YEAR INTERVAL INSERVICE INSPECTION

REQUESTS FOR RELIEF NDE-043, NDE-044, AND NDE-045

NORTH ANNA POWER STATION, UNIT 2

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-339

1.0 INTRODUCTION

Inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components is performed in accordance with Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i).

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The Code of record for the North Anna Power Station, Unit 2 (North Anna), second 10-year ISI interval is the 1986 Edition of the ASME Boiler and Pressure Vessel Code.

2.0 EVALUATION

The staff has reviewed the information concerning second 10-year ISI program Requests for Relief NDE-043, NDE-044, and NDE-045 for North Anna, Unit 2 in the Virginia Electric and Power Company (the licensee) letter dated April 24, 2000. The licensee submitted additional information by its letter dated July 21, 2000.

2.1 Request for Relief No. NDE-043:

Code Requirement: The 1986 Edition of ASME Section XI, Table IWB-2500-1, examination Category B-D, Item Number B3.110, requires a 100% volumetric examination of the nozzle to the pressurizer head. The examination volume shall apply to the applicable figure shown in Figs. IWB-2500-7(a) through (d) of the ASME Code.

Licensee's Proposed Request for Relief: Relief is requested from examining the Code-required volumetric examination for the identified nozzle-to-head weld.

Component Identification

<u>Mark/Weld #</u>	<u>Line</u>	<u>Drawing #</u>	<u>Class</u>
13	NA	12050-WMKS-RC-E-2	1

Licensee's Proposed Alternative:

It is proposed that the examinations already completed at the reduced coverage be counted as meeting the Code requirements. In addition:

1. A visual (VT-2) examination will be performed during the normally scheduled system leakage test each refueling outage;
2. Technical Specifications require that the reactor coolant system leak rate be limited to one gallon per minute unidentified leakage. This value is calculated at least once per 72 hours; and
3. The containment atmosphere particulate radioactivity is monitored every 12 hours.

The proposed alternative examinations stated above will ensure that the overall level of plant quality and safety will not be compromised.

Licensee's Basis for Proposed Relief:

Weld 13 has been examined to the extent practical as required by the Code. Due to weld joint geometry the reduction in coverage for the listed components was greater than 10%. The weld geometry [is] due to the weld configuration and the transition from the nozzle to the pressurizer head. The nozzle is situated on the pressurizer in such a manner that the angle between the nozzle and the pressurizer head is not perpendicular. The intrados of this angle is the major contributor to the reduced coverage experienced because it limits search unit manipulation. The weld was examined to the maximum extent possible by supplementing the examination with 1/4", 45° and 60° transducers. Table NDE-43-1 is provided detailing the limitations experienced. \*\*\*

**Table NDE-43-1  
North Anna Unit 2  
Pressurizer Relief Nozzle to Head Weld  
Examination Coverage Estimates  
Category B-D, Item B3.1.10**

Mark/Weld #	Beam Angle	Exam Area	Scan Direction	% Examined	Reason For Partial
13	0	Weld & Base Metal	0	85	Weld joint configuration
	45	Weld & Base Metal	2	99	Weld joint configuration
	45	Weld & Base Metal	5	76	Weld joint configuration
	45	Weld & Base Metal	7	100	Weld joint configuration
	45	Weld & Base Metal	8	100	Weld joint configuration
	60	Weld & Base Metal	2	99	Weld joint configuration
	60	Weld & Base Metal	5	50	Weld joint configuration
	60	Weld & Base Metal	7	100	Weld joint configuration
	60	Weld & Base Metal	8	100	Weld joint configuration
				Coverage	89.9%

UT Scan Direction Definitions

- 2 - Axial scan head side of weld
- 5 - Axial scan nozzle side of weld
- 7 - Circumferential scan, clockwise (when facing the head)
- 8 - Circumferential scan, counterclockwise (when facing the head)

Evaluation: Examination Category B-D, Item B3.110, requires a 100-percent volumetric examination of the nozzle to the pressurizer head and that the examination volume shall apply to the applicable figure shown in Figs. IWB-2500-7(a) through (d). The licensee provided drawings showing the layouts and limitations of the subject welds; these are summarized below.

The staff determined that, as evidenced by the sketches provided, complete examination coverage is impractical because the Code-required examination is limited by the transition from the nozzle to the pressurizer head. The nozzle is situated on the pressurizer in such a manner that the angle between the nozzle and the pressurizer head is not perpendicular. To gain access for examination, the nozzle to the pressurizer head would require design modifications. Therefore, imposition of this requirement would be a significant burden on the licensee.

The weld was examined to the maximum extent possible by supplementing the examination with 1/4", 45° and 60° transducers for this weld. By supplementing the examination, the licensee has examined a significant portion of the nozzle to the pressurizer head. The licensee obtained 89.9-percent volumetric coverage of the subject weld. Based on the volumetric coverage obtained and the licensee's performance of a Code-required VT-2 visual examination during the system leakage test, the staff determined that any existing patterns of degradation would have been detected by the examinations that were completed. Therefore, these examinations provided reasonable assurance of structural integrity of the subject component.

Based on the impracticality of meeting the Code examination coverage requirements for the subject weld, and the reasonable assurance of structural integrity of the subject weld provided by the examinations completed, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

2.2 Request for Relief No. NDE-044:

Code Requirement: The 1986 Edition of ASME Section XI, Table IWC-2500-1, examination Category C-B, Item Number C2.21, requires 100-percent volume and surface examinations of the boron injection tank (BIT) inlet-to-head weld and the BIT outlet nozzle-to-head weld. The examination volume and surface exams shall apply to the applicable figure shown in Figs. IWC-2500-4(a) or (b).

Licensee's Proposed Request for Relief: Relief is requested from examining the Code-required volumetric examination for the identified nozzle-to-head welds.

Components Identification

<u>Mark/Weld #</u>	<u>Line #</u>	<u>Drawing #</u>	<u>Class</u>
3	NA	12050-WMKS-SI-TK-2	2
4	NA	12050-WMKS-SI-TK-2	2

Licensee's Proposed Alternative:

It is proposed that the examinations already completed at the reduced coverage be counted as meeting the Code requirements.

Licensee's Basis for Proposed Relief:

Welds 3 and 4 have been examined to the extent practical as required by the Code. Due to weld joint geometry the reduction in coverage for the listed components was greater than 10%. Tables NDE-44-1 and 2 are provided detailing the limitations experienced.

The ASME Code requires that these welds receive volumetric and surface examinations. For the required surface examinations, these welds received 100-percent coverage using the magnetic particle examination method. The 100-percent coverage achieved by the surface examinations, along with the partial coverage achieved by the ultrasonic examinations, provide adequate assurance of weld integrity.

**Table NDE-44-1  
North Anna Unit 2  
Boron Injection Tank Inlet Nozzle to Head Weld  
Examination Coverage Estimates  
Category C-B, Item C2.21**

Mark/Weld #	Beam Angle	Exam Area	Scan Direction	% Examined	Reason For Partial
3	0	Weld & Base Metal	-	50	Weld joint configuration
	45	Weld & Base Metal	2	91	Weld joint configuration
	45	Weld & Base Metal	5	0	Weld joint configuration
	45	Weld & Base Metal	7	15	Weld joint configuration
	45	Weld & Base Metal	8	15	Weld joint configuration
	60	Weld & Base Metal	2	100	
	60	Weld & Base Metal	5	0	Weld joint configuration
	60	Weld & Base Metal	7	15	Weld joint configuration
	60	Weld & Base Metal	8	15	Weld joint configuration
				Coverage	33.4%

UT Scan Direction Definitions

- 2 - Axial scan head side of weld
- 5 - Axial scan nozzle side of weld
- 7 - Circumferential scan, clockwise (rotation when facing the head)
- 8 - Circumferential scan, counterclockwise (rotation when facing the head)

**Table NDE-44-2  
North Anna Unit 2  
Boron Injection Tank Outlet Nozzle to Head Weld  
Examination Coverage Estimates  
Category C-B, Item C2.21**

Mark/Weld #	Beam Angle	Exam Area	Scan Direction	% Examined	Reason For Partial
4	0	Weld & Base Metal	-	50	Weld joint configuration
	45	Weld & Base Metal	2	91	Weld joint configuration
	45	Weld & Base Metal	5	0	Weld joint configuration
	45	Weld & Base Metal	7	15	Weld joint configuration
	45	Weld & Base Metal	8	15	Weld joint configuration
	60	Weld & Base Metal	2	100	
	60	Weld & Base Metal	5	0	Weld joint configuration
	60	Weld & Base Metal	7	15	Weld joint configuration
	60	Weld & Base Metal	8	15	Weld joint configuration
				Coverage	33.4%

UT Scan Direction Definitions

- 2 - Axial scan head side of weld
- 5 - Axial scan nozzle side of weld
- 7 - Circumferential scan, clockwise (when facing the head)
- 8 - Circumferential scan, counterclockwise (when facing the head)

Evaluation: The Code requires 100-percent volumetric examination and surface examinations of the BIT inlet-to-head weld No. 3 and the BIT outlet nozzle-to-head weld No. 4. However, examinations of the subject welds are limited due to weld joint geometry. These limitations make 100-percent volumetric examinations impractical. To gain access for examination, the subject welds would require design modifications. Therefore, imposition of this requirement would create an undue burden on the licensee. The licensee performed the required surface examinations and obtained 100-percent coverage for the subject welds using the magnetic particle examination method.

The licensee has obtained 33.4-percent coverage for each of the subject welds. Based on the coverage obtained and the licensee's performance of the Code-required surface examination, which obtained 100-percent coverage, the staff determined that any existing patterns of degradation would have been detected by the examinations that were completed. Therefore, the licensee's examinations provide reasonable assurance of structural integrity of the subject welds.

Based on the impracticality of meeting the Code coverage requirements for the subject welds, and the reasonable assurance of structural integrity provided by the examinations that were completed, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

### 2.3 Request for Relief No. NDE-045:

Code Requirement: The 1986 edition of ASME Section XI, Tables IWB-2500-1, examination Category B-J, Item Number B9.11, requires a volumetric and surface examination of essentially 100-percent weld length of the inlet pipe-to-reactor coolant pump weld and the reactor coolant pump-to-discharged pipe weld. The examination volume and surface examinations shall apply to the applicable figure shown in Figs. IWB-2500-8.

Licensee's Proposed Request for Relief: Relief is requested from examining the Code-required volumetric examination for the identified pipe-to-pump welds.

#### Component Identification:

<u>Mark/Weld #</u>	<u>Line #</u>	<u>Drawing #</u>	<u>Class</u>
8	31"-RC-402-2501R-Q1	12050-WMKS-0109E-1	1
21	271/2"-RC-406-2501R-Q1	12050-WMKS-0109F-1	1

#### Licensee's Proposed Alternative:

It is proposed that the examinations already completed at the reduced coverage be counted as meeting the Code requirements. In addition:

1. A visual (VT-2) examination will be performed during the normally scheduled system leakage test each refueling outage;

2. Technical Specifications require that the reactor coolant system leak rate be limited to one gallon per minute unidentified leakage. This value is calculated at least once per 72 hours; and
3. The containment atmosphere particulate radioactivity is monitored every 12 hours.

The proposed alternative examinations stated above will ensure that the overall level of plant quality and safety will not be compromised.

Licensee's Basis for Proposed Relief:

Welds 8 and 21 have been examined to the extent practical as required by the Code. The Code-required volumetric examination coverage is reduced due to weld joint geometry and the material type from which the components are constructed. The scope of volumetric examination coverage completed for the above listed welds is listed in Tables NDE-45-1 and 2. \*\*\* These welds are classified as terminal ends and are required to be examined by the ISI Program.

A radiograph is the only other method for performing volumetric examinations. However, radiographic examination of these welds is not practical due to limitations in accessibility, local radiation levels, and pipe to pump transitions. We believe that this combination of factors would reduce the quality and definition of any radiographs such that no meaningful results would be obtained.

Specifically, the inside of the pipe is not accessible. Therefore, a double wall exposure would be required. The outside of the pipe where the film would be placed has a contact radiation dose from approximately 700 mr/hr to 2000 mr/hr. This radiation dose would reduce the contrast of the radiograph over the long exposure times needed for large diameter (27.5 and 31 inches) and thick (2.32 and 2.59 inches) pipes. Radiographs of very poor quality would be expected.

The geometry of the weld joints involves pipe to pump casing welds where the pump casing is much thicker than the pipe wall. This transition in section thickness affects the latitude that could be obtained with radiography. Poor latitude would be expected for the radiograph. Also, the large grain size of the cast austenitic material tends to scatter the radiation beam as it passes through the material. Having the beam pass through 5 inches of austenitic material will further reduce the definition of the radiographs.

These welds received 100-percent surface examinations using the liquid penetrant examination method. The 100-percent coverage achieved by the surface examinations, along with the partial coverage achieved by the ultrasonic examinations, provide adequate assurance of weld integrity.

**Table NDE-45-1  
North Anna Unit 2  
Inlet Pipe to Reactor Coolant Pump Weld  
Examination Coverage Estimates  
Category B-J, Item B9.11**

Mark/Weld #	Beam Angle	Exam Area	Scan Direction	% Examined	Reason For Partial
8	45	Weld & Base Metal	2	0	Weld joint configuration
	45	Weld & Base Metal	5	100	
	45	Weld & Base Metal	7	100	
	45	Weld & Base Metal	8	100	
			Coverage	75%	

UT Scan Direction Definitions

- 2 - Axial scan, 180 degrees from isometric flow direction (Weld count)
- 5 - Axial scan, the same direction as the isometric flow (Weld count)
- 7 - Circumferential scan, clockwise rotation when viewing in the direction of isometric flow
- 8 - Circumferential scan, counterclockwise rotation when viewing in the direction of isometric flow

**Table NDE-45-2  
North Anna Unit 2  
Reactor Coolant Pump to Discharge Pipe Weld  
Examination Coverage Estimates  
Category B-J, Item B9.11**

Mark/Weld #	Beam Angle	Exam Area	Scan Direction	% Examined	Reason For Partial
21	45	Weld & Base Metal	2	100	Weld joint configuration
	45	Weld & Base Metal	5	0	
	45	Weld & Base Metal	7	50	
	45	Weld & Base Metal	8	100	
			Coverage	62.5%	

UT Scan Direction Definitions

- 2 - Axial scan, 180 degrees from isometric flow direction (Weld count)
- 5 - Axial scan, the same direction as the isometric flow (Weld count)
- 7 - Circumferential scan, clockwise rotation when viewing in the direction of isometric flow
- 8 - Circumferential scan, counterclockwise rotation when viewing in the direction of isometric flow

Evaluation: The Code requires 100-percent volumetric examination and surface examination of the inlet pipe-to-reactor coolant pump (2-RC-P-1A) weld No. 8 and the reactor coolant pump (2-RC-P-1B)-to-discharge pipe weld No. 21. However, examinations of the subject welds are limited due to weld joint geometry. These limitations make 100-percent volumetric examinations impractical. To gain access for examination, the subject welds would require design modifications. The licensee considered performing a radiograph as an alternative to the ultrasonic volumetric examinations. However, radiographic examination of these welds is not practical due to limitations in accessibility, local radiation levels, and pipe-to-pump transitions. The combination of these factors would reduce the quality and definition of any radiographs such that no meaningful results would be obtained. Therefore, the Code-required volumetric examinations are impractical.

The licensee has examined a significant portion of the weld, obtaining 75-percent and 62.5-percent coverage for Weld Number 8, Line 31"-RC-402-2501R-Q1 and Weld No. 21, Line 271/2"-RC-406-2501R-Q1, respectively. In addition, the licensee performed the required

surface examinations, using the liquid penetrant method, and obtained 100-percent coverage on the subject welds. Based on the volumetric coverage and 100-percent surface examinations completed, the staff determined that any existing patterns of degradation would have been detected. Therefore, the licensee's examinations provide reasonable assurance of structural integrity of the subject welds.

Based on the impracticality of meeting the Code coverage requirements for the subject welds, and the reasonable assurance of structural integrity provided by the examinations that were completed, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i).

### 3.0 CONCLUSION

The staff evaluated the licensee's submittal and concluded that certain inservice examinations cannot be performed to the extent required by the Code at North Anna, Unit 2. For Requests for Relief NDE-043, NDE-044, and NDE-045, the staff concludes that the Code requirements are impractical for the subject welds, and reasonable assurance of structural integrity is provided by the examinations that were completed. The granting of relief pursuant to 10 CFR 50.55(g)(6)(i) is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year ISI program.

Principal Contributor: T. McLellan

Date: November 21, 2000

**SUMMARY OF RELIEF REQUESTS**

<b>Relief Request Number</b>	<b>SE Sec</b>	<b>System or Comp</b>	<b>Exam Cat.</b>	<b>Item No.</b>	<b>Volume or Area to be Examined</b>	<b>Required Method</b>	<b>Licensee Proposed Alternative</b>	<b>Relief Request Disposition</b>
NDE-43	2.1	Pressurizer	B-D	B3.110	Pressurizer nozzle-to-head weld	Volumetric	Examined to the extent practical	Granted pursuant to 10 CFR 50.55a(g)(6)(i)
NDE-44	2.2	Boron Injection Tank	C-B	C2.21	Boron Injection Tank Inlet Nozzle to Head Weld	Volumetric and Surface	Examined to the extent practical	Granted pursuant to 10CFR 50.55a(g)(6)(i)
NDE-45	2.3	Reactor Coolant Pump	B-J	B9.11	Reactor Coolant Pump inlet and discharge pipe weld	Volumetric and Surface	Examined to the extent practical	Granted pursuant to 10 CFR 50.55a(g)(6)(i)

Mr. David A. Christian  
Virginia Electric and Power Company

North Anna Power Station  
Units 1 and 2

cc:

Mr. C. Lee Lintecum  
County Administrator  
Louisa County  
P.O. Box 160  
Louisa, Virginia 23093

Mr. W. R. Matthews  
Site Vice President  
North Anna Power Station  
P.O. Box 402  
Mineral, Virginia 23117

Mr. Donald P. Irwin, Esquire  
Hunton and Williams  
Riverfront Plaza, East Tower  
951 E. Byrd Street  
Richmond, Virginia 23219

Mr. E. S. Grecheck  
Site Vice President  
Surry Power Station  
Virginia Electric and Power Company  
5570 Hog Island Road  
Surry, Virginia 23883

Dr. W. T. Lough  
Virginia State Corporation  
Commission  
Division of Energy Regulation  
P.O. Box 1197  
Richmond, Virginia 23209

Robert B. Strobe, M.D., M.P.H.  
State Health Commissioner  
Office of the Commissioner  
Virginia Department of Health  
P. O. Box 2448  
Richmond, Virginia 23218

Old Dominion Electric Cooperative  
4201 Dominion Blvd.  
Glen Allen, Virginia 23060

Mr. J. H. McCarthy, Manager  
Nuclear Licensing & Operations Support  
Virginia Electric and Power Company  
Innsbrook Technical Center  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

Office of the Attorney General  
Commonwealth of Virginia  
900 East Main Street  
Richmond, Virginia 23219

Senior Resident Inspector  
North Anna Power Station  
U.S. Nuclear Regulatory Commission  
1024 Haley Drive  
Mineral, Virginia 23117