VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

August 22, 2001

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

Serial No. 01-486
NL&OS/GDM R0
Docket No. 50-280, 281
License No. DPR-32, 37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
RELIEF REQUESTS SH-3 AND SH-4

Surry Power Station Units 1 and 2 are presently in their third ten-year inservice inspection interval, third period, and examinations are conducted in accordance with the requirements of the 1989 Edition of the ASME Section XI Code. Due to a recent interpretation of Code requirements regarding snubber testing activities, Virginia Electric and Power Company (Dominion) requests relief from specific Code requirements for snubbers for the third inspection interval. Relief request SH-4 for Surry Unit 1 and SH-3 for Surry Unit 2 address snubber functional testing requirements (IWF-5000) and are provided in the attachment for your review and approval.

Relief requests SH-3 and SH-4 are requested under the provisions for impractical Code requirements specified in 10 CFR 50.55a(g)(5)(iv). NRC approval of the attached relief requests is requested by October 12, 2001, in support of the Surry Unit 1 refueling outage in Fall 2001. Similar ASME Code relief was requested for North Anna Power Station Units 1 and 2 in a letter dated May 30, 2001 (Serial No. 01-329).

The attached relief requests for Surry Units 1 and 2 have been approved by the Station Nuclear Safety and Operating Committee. If you have questions or require additional information, please contact us.

Very truly yours,

Eugene S. Grecheck
Vice President - Nuclear Support Services

Attachment

A047

Commitments made in this letter: None

cc: U. S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
Suite 23T85
61 Forsyth St., S.W.
Atlanta, Georgia 30303-8931

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

Mr. R. Smith
Authorized Nuclear Inspector
Surry Power Station

Attachment

Relief Requests SH-3 and SH-4
Snubber Testing and Repair and Replacement

Dominion
Surry Power Station Units 1 and 2

Dominion
Surry Power Station Unit 1

RELIEF REQUEST SH-4

I. IDENTIFICATION OF COMPONENTS:

ISI Class 1, 2, and 3 Snubbers

II. CODE REQUIREMENT:

Code required inservice testing (Section XI of the ASME Boiler and Pressure Vessel Code, 1989 Edition, IWF-5200, for preservice and IWF-5300 for inservice) on the snubbers identified above, and the associated snubber testing review performed by the Authorized Nuclear Inservice Inspector (ANII) in IWA-2110.

III. BASIS FOR RELIEF:

The Final Rulemaking included in the Federal Register dated November 22, 1999 endorsed the 1995 ASME Section XI Code through the 1996 Addenda for use by licensees when performing 10-year Inservice Inspection Program updates. Within the Federal Register discussion, references were made that the new rules, as well as the old, required the testing of snubbers per ASME Section XI, IWF-5000. This discussion acknowledged that previous Federal Register Rulemaking discussions (reference 62FR 63903, December 3, 1997) on snubber testing may have been confusing with regard to the applicability of 10CFR50.55a and snubber testing. The discussion in the earlier Federal Register notice (1997) appeared to direct licensees to Technical Specifications for testing requirements for snubbers. The discussion in the 1999 notice; however, directs licensees to follow the requirements of IWF-5000 noting that the requirement has been in effect since 1978.

Surry Unit 1 is currently in the third period of the third inspection interval. The Inservice Inspection Program for the third interval was submitted to the NRC with the following statement in section 3.2, "The program does not cover the functional testing of snubbers. Snubbers will be tested to the functional testing requirements described in Technical Specifications." No relief request was developed as none was thought necessary based upon earlier interpretations of the Federal Register Rulemaking discussion (reference 57FR34666, August 6, 1992), which explicitly stated that 10 CFR50.55a does not specify requirements for the testing of snubbers. The Federal Register notice states that requirements for the testing of snubbers are generally governed by plant Technical Specifications.

The snubbers have been functionally tested as required by plant Technical Specification 4.17. Technical differences between the Code and Technical Specifications requirements are minor (e.g., size of sample populations, the Technical Specifications have a larger initial sample for testing, additional examination requirements as a result of failures are different, but accomplish the same purpose), and the testing being performed continued to assure component operability. Testing results were reviewed as required by the quality assurance program, however there was no ANII involvement since none was thought necessary.

Given the direct reference to IWF-5000 in the 1999 Federal Register notice, a Code relief request is necessary to permit only the Technical Specifications functional testing requirements to serve as the sole applicable requirement for the snubber testing performed to date for Surry Unit 1 third interval. Since no IWF-5000 snubber testing has been performed, completion of the Code requirements referenced is considered impractical and relief is requested per 10 CFR 50.55a(g)(5)(iv).

IV. PROPOSED ALTERNATE REQUIREMENTS:

In lieu of the Code requirements specified in IWF-5200 and IWF-5300 for snubber inservice testing and IWA-2110 concerning the ANII review of snubber testing results, the functional testing requirements of Surry Technical Specification 4.17 shall be followed.

The proposed alternative testing stated above ensures that the overall level of plant quality and safety will not be, nor has been compromised.

Dominion
Surry Power Station Unit 2

RELIEF REQUEST SH-3

I. IDENTIFICATION OF COMPONENTS:

ISI Class 1, 2, and 3 Snubbers

II. CODE REQUIREMENT:

Code required inservice testing (Section XI of the ASME Boiler and Pressure Vessel Code, 1989 Edition, IWF-5200 for preservice and IWF-5300 for inservice) on the snubbers identified above, and the associated snubber testing review performed by the Authorized Nuclear Inservice Inspector (ANII) in IWA-2110.

III. BASIS FOR RELIEF:

The Final Rulemaking included in the Federal Register dated November 22, 1999 endorsed the 1995 ASME Section XI Code through the 1996 Addenda for use by licensees when performing 10-year Inservice Inspection Program updates. Within the Federal Register discussion, references were made that the new rules, as well as the old, required the testing of snubbers per ASME Section XI, IWF-5000. This discussion acknowledged that previous Federal Register Rulemaking discussions (reference 62FR 63903, December 3, 1997) on snubber testing may have been confusing with regard to the applicability of 10CFR50.55a and snubber testing. The discussion in the earlier Federal Register notice (1997) appeared to direct licensees to Technical Specifications for testing requirements for snubbers. The discussion in the 1999 notice; however, directs licensees to follow the requirements of IWF-5000 noting that the requirement has been in effect since 1978.

Surry Unit 2 is currently in the third period of the third inspection interval. The Inservice Inspection Program for the third interval was submitted to the NRC with the following statement in section 3.2, "The program does not cover the functional testing of snubbers. Snubbers will be tested to the functional testing requirements described in Technical Specifications." No relief request was developed as none was thought necessary based upon earlier interpretations of the Federal Register Rulemaking discussion (reference 57FR34666, August 6, 1992), which explicitly stated that 10 CFR50.55a does not specify requirements for the testing of snubbers. The Federal Register notice states that requirements for the testing of snubbers are generally governed by plant Technical Specifications.

The snubbers have been functionally tested as required by plant Technical Specification 4.17. Technical differences between the Code and Technical Specifications requirements are minor (e.g., size of sample populations, the Technical Specifications have a larger initial sample for testing, additional examination requirements as a result of failures are different, but accomplish the same purpose), and the testing being performed continued to assure component operability. Testing results were reviewed as required by the quality assurance program, however there was no ANII involvement since none was thought necessary.

Given the direct reference to IWF-5000 in the 1999 Federal Register notice, a Code relief request is necessary to permit only the Technical Specifications functional testing requirements to serve as the sole applicable requirement for the snubber testing performed to date for Surry Unit 2 third interval. Since no IWF-5000 snubber testing has been performed, completion of the Code requirements referenced is considered impractical and relief is requested per 10 CFR 50.55a(g)(5)(iv).

IV. PROPOSED ALTERNATE REQUIREMENTS:

In lieu of the Code requirements specified in IWF-5200 and IWF-5300 for snubber inservice testing and IWA-2110 concerning the ANII review of snubber testing results, the functional testing requirements of Surry Technical Specification 4.17 shall be followed.

The proposed alternative testing stated above ensures that the overall level of plant quality and safety will not be, nor has been compromised.