

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

January 2, 2002

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

Serial No.: 01-744
NL&OS/GDM: R0
Docket No.: 50-280
50-281
License No.: DPR-32
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
ASME SECTION XI INSERVICE TESTING PROGRAM
RELIEF REQUESTS G-1

Surry Power Station Units 1 and 2 are presently in their third ten-year inservice testing interval. Inservice tests on pumps and valves are conducted in accordance with the requirements of the 1989 Edition of the ASME Section XI Code. The 1989 Edition of the Code also specifies the duties of the Authorized Nuclear Inservice Inspector (ANII) pertaining to the inservice testing program. However, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector due to the minimal value added. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), Relief Requests G-1 for Surry Units 1 and 2 are attached hereto for your review and approval to eliminate the Code-specified requirements for ANII involvement in the inservice testing program for pumps and valves.

This request has been approved by the Surry Station Nuclear Safety and Operating Committee. If you have any questions or require additional information, please contact us.

Very truly yours,



L. N. Hartz
Vice President- Nuclear Engineering and Services

Attachment

A047

Commitments contained in this letter: None

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

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

Robert Smith
Authorized Nuclear Inspector
Surry Power Station

Attachment

Relief Requests G-1
Surry Power Station Units 1 and 2

Dominion

RELIEF REQUEST G-1
SURRY POWER STATION UNIT 1

I. Section XI Code Requirements For Which Relief Is Requested

Section XI, IWA-2110, the 1989 Edition, details the duties of the inspector that pertain to inservice tests required on pumps and valves and component supports.

II. Basis For Relief

Section XI, IWA-2110, the 2000 Addenda to the 1998 Edition eliminates reference to inservice testing (IST) on pumps and valves as a duty of the inspector.

The Authorized Nuclear Inservice Inspector's (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of the ANII relative to the inservice test performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded. In general, ANIIs do not have the training or background experience to make determinations about component safety functions in order to verify program scope, or to assess the operational readiness of components based on test results. Consequently, the ANII review provides little benefit.

Surry has a multi-layered review process that performs the same functions as the ANII noted above but with individuals who have extensive experience in the Code-required testing of pumps and valves. Also, the IST Program is subject to the Surry Quality Assurance Program that provides an equivalent, or greater level of quality and safety than the requirements for ANII involvement specified in the Code. Therefore, there is no quality-related benefit in the ANII duplicating the review efforts performed by station personnel.

III. Proposed Alternate Requirements

The Code requirements specifying the duties of the ANII described in ASME Section XI, IWA-2110 will be eliminated from the IST Program.

The proposed alternative to the specific requirements of ASME Section XI, IWA-2110 identified above (i.e., a multi-layered review of the IST Program performed by experienced licensee personnel) will provide an acceptable level of quality and safety. Furthermore, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), we request relief from the specific IWA Code requirements identified in this relief request for Surry Unit 1.

RELIEF REQUEST G-1
SURRY POWER STATION UNIT 2

I. Section XI Code Requirements For Which Relief Is Requested

Section XI, IWA-2110, the 1989 Edition, details the duties of the inspector that pertain to inservice tests required on pumps and valves.

II. Basis For Relief

Section XI, IWA-2110, the 2000 Addenda to the 1998 Edition eliminates reference to inservice testing (IST) on pumps and valves as a duty of the inspector.

The Authorized Nuclear Inservice Inspector's (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of the ANII relative to the inservice test performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded. In general, ANIIs do not have the training or background experience to make determinations about component safety functions in order to verify program scope, or to assess the operational readiness of components based on test results. Consequently, the ANII review provides little benefit.

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The Code requirements specifying the duties of the ANII described in ASME Section XI, IWA-2110 will be eliminated from the IST Program.

The proposed alternative to the specific requirements of ASME Section XI, IWA-2110 identified above (i.e., a multi-layered review of the IST Program performed by experienced licensee personnel) will provide an acceptable level of quality and safety. Furthermore, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), we request relief from the specific IWA Code requirements identified in this relief request for Surry Unit 2.