

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

April 4, 2002

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No.: 02-211
NL&OS/ETS R0
Docket No.: 50-339
License No.: NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 2
THIRD INTERVAL INSERVICE INSPECTION PROGRAM
REVISED RELIEF REQUEST SPT-001

In a letter dated June 13, 2001, Serial No. 01-328, Virginia Electric and Power Company (Dominion) submitted the inservice inspection (ISI) program for the third inservice inspection interval for North Anna Unit 2 for Class 1, 2, and 3 components and component supports. This program has been written in accordance with the requirements of the 1995 Edition, Section XI with Addenda up to and including 1996 Addenda of Section XI of the ASME Boiler and Pressure Vessel Code. However, the unit was not designed to completely meet the detailed inservice inspection requirements of Section XI. Therefore, alternatives and relief for specific ASME Code requirements were included with the program submittal. In a telephone conference call with the NRC, additional information was requested by the NRC staff to complete the review of Relief Request SPT-001.

The revised relief request, containing the additional information, has been reviewed and approved by the Station Nuclear Safety and Operating Committee.

If you need any additional information, please contact us.

Very truly yours,



William R. Matthews
Vice President - Nuclear Operations

Commitments made in this letter:

1. There are no new commitments in this letter.

Attachment

A047

cc: U.S. Nuclear Regulatory Commission
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RELIEF REQUEST SPT-001 Revision 1

I. IDENTIFICATION OF COMPONENTS

Class 1 pressure retaining components.

II. IMPRACTICAL CODE REQUIREMENTS

Section XI, 1995 Edition with addenda up to and including the 1996 Addenda requires the following:

- 1) Table IWB-2500-1, Category B-P requires that all Class 1 pressure retaining components receive a system leakage test each refueling outage. Note (2) of the table states "The system leakage test (IWB-5220) shall be conducted prior to plant startup following each reactor refueling outage."
- 2) IWB-5220 (a) requires, "The system leakage test shall be conducted at a pressure not less than nominal operating pressure associated with normal system operation."
- 3) IWA-2212 (b) by reference to Table IWA-2210-1 requires the "maximum examination distance (*as allowed by Table IWA-2210-1*) shall apply to the distance from the eye to the surfaces being examined." The maximum distance allowed by Table IWA-2210-1 is six feet.

III. BASIS FOR RELIEF

NAPS 2 is designed with a subatmospheric containment. The Class 1 system leakage test is performed during Mode 3. The plant's Technical Specifications require the subatmospheric conditions to exist when the plant is in Mode 3. The subatmospheric requirements create conditions that require the use of self-contained breathing apparatus (SCBA) with full-face respirators by anyone required to be in the containment.

The VT-2 remote visual examination procedure has been demonstrated using no visual aids to a distance of nine feet nine inches using a visual card that complies with the 1995 Edition, 1996 Addenda of the ASME Code. We have evaluated additional remote monitoring equipment and determined they are not practical for inspectors wearing full-face respirators and SCBA. The use of binoculars or a telescope is not feasible due to not being able to place the eyepiece directly to the inspector's eye.

In order to perform direct examination within the maximum distance requirements of IWA-2212 (b) it will be necessary to leave scaffolding in place to be able to access, within six feet, all surfaces that require examination. The use of scaffolding would only be allowed in containment during Mode 3 if it has been designed and erected to withstand the design seismic event without causing damage to safety related

equipment. The design of the scaffolding, installation at the end of one outage, and then disassembly at the beginning of the next refueling outage only to start the installation process over at the end of that outage is impractical. To leave the scaffolding in place until the Class 1 system leakage test is completed and then remove it before proceeding with startup is also impractical. Because of the subatmospheric containment, it would be necessary to either bring the unit back to Cold Shutdown, Mode 5 or attempt to remove the scaffolding using self-contained breathing apparatus, which would be an unreasonable burden for the personnel involved.

ASME Code Interpretation XI-1-98-06 is consistent with this relief request. XI-1-98-06 states:

Subject: IWA-2210, IWA-2212, and IWA-5240; VT-2 Visual Examination Requirements (1992 Edition Through the 1995 Edition with the 1997 Addenda), Date Issued: January 16, 1998, File: IN97-034

Question (1): Is it a requirement of IWA-2212(b) and Table IWA-2210-1 that all VT-2 examinations be conducted by direct examination?

Reply (1): No

Question (2): When items subject to VT-2 examinations are inaccessible for direct examination because the distance requirement is exceeded, does IWA-2210 require a remote examination be performed?

Reply (2): No. Alternatives are described in IWA-5241 and IWA-5242

Question (3): When performing a VT-2 visual examination on surrounding areas (including floor areas or equipment surfaces) per IWA-5241(b) or IWA-5242(b), do the requirements of Table IWA-2210-1 apply to the surrounding area rather than the actual component?

Reply (3): Yes

IV. ALTERNATE PROVISIONS

NAPS 2 requests approval in accordance with 10 CFR 50.55a(a)(3)ii to perform the Class 1 system leakage test without the erection of temporary scaffolding to satisfy the examination requirements of Table-2210-1. As an alternative, existing permanent structures, platforms or ladders will be used to the extent practical to gain access to the surface to be examined. The required visual examination will be performed from the access afforded by these structures, ladders or platforms to the extent practical. Any examination surface that cannot be accessed per the requirements of Table-2210-1 or to the maximum qualified remote distance will be considered "inaccessible". As such the surrounding area (including floor areas or equipment surfaces located underneath the inaccessible components) will be examined for leakage as required by IWA-5241(b) or IWA-5242(b).