

May 22, 2002

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

SUBJECT: SURRY POWER STATION UNITS 1 AND 2 RE: ASME SECTION XI,
INSERVICE TESTING (IST) PROGRAM RELIEF REQUEST (TAC NOS. MB3798
and MB3799)

Dear Mr. Christian:

This letter grants the relief you requested from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code Section XI for Surry Power Station, Units 1 and 2. The relief relates to the duties of the Authorized Nuclear Inservice Inspector (ANII) with regard to the IST program for pumps and valves.

By letter dated January 2, 2002, Virginia Electric and Power Company requested relief from the requirements of the ASME B&PV Code Section XI in order to eliminate involvement with IST of pumps and valves as a duty of the ANII because of the minimal value added.

The staff concludes that you have presented an adequate justification for your request for relief from the requirements of the ASME Code, 1989 Edition, Section XI, as described in the G-1 Relief Requests for Surry Units 1 and 2. The staff concurs with you that the proposed alternative continues to ensure that the overall level of plant quality and safety will be maintained at an acceptable level. Therefore, the proposed alternative is authorized pursuant to Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(i) for the remainder of the term of the operating licenses for these facilities based on the acceptable level of quality and safety that will be provided by the alternative. The relief granted 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.

David A. Christian

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The staff has completed its evaluation of this request; therefore, we are closing TAC Nos. MB3798 and MB3799.

Sincerely,

/RA/

John A. Nakoski, Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure: Safety Evaluation

cc w/encl: See next page

D. A. Christian

- 2 -

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ADAMS ACCESSION NUMBER: ML0214200095

* See previous concurrence.

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE INSERVICE TESTING PROGRAM RELIEF REQUEST FOR
VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
DOCKET NUMBERS 50-280 AND 50-281

1.0 INTRODUCTION

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a requires that inservice testing (IST) of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (the Code) and applicable addenda, except where alternatives have been authorized or relief has been requested by the licensee and granted by the Commission pursuant to paragraphs (a)(3)(i), (a)(3)(ii), or (f)(6)(i) of 10 CFR 50.55a. In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for its facility. Section 50.55a authorizes the Commission to approve alternatives and to grant relief from ASME Code requirements upon making the necessary findings. NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," provides alternatives to the Code requirements that are acceptable. Further guidance is given in GL 89-04, Supplement 1, and NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants."

By letter dated January 2, 2002, Virginia Electric and Power Company, the licensee for Surry Power Station Units 1 and 2, submitted a request for relief from the requirements pertaining to the duties of the Authorized Inspection Agency and Inspectors (AIAI) as identified in the 1989 Edition of the ASME Code, Section XI, IWA-2110. The staff has reviewed the relief request and is providing the following evaluation for Surry Units 1 and 2.

2.0 EVALUATION

2.1 Relief Request G-1

The licensee has requested relief from the requirements of Section XI, IWA-2110, of the 1989 ASME Code that states it is the duty of the inspector to verify that the IST required on pumps, valves, and component supports (IWF, IWP, AND IWV) has been completed and the results recorded.

2.1.1 Licensee's Basis for Requesting Relief

The licensee states:

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 ANII relative to the inservice test[s] 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.

2.1.2 Alternative Testing

The licensee proposes:

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[s] 1 [and] 2.

2.1.3 Evaluation

Section XI, IWA-2110, of the 1989 ASME Code, as well as the 1995 Edition with the 1996 Addenda of the OM Code, requires that IST activities be verified by an ANII. It is the ANII's duty to verify that IST on pumps, valves, and components supports has been completed and results recorded. The licensee proposes to eliminate from the IST Program for pumps and valves the specific duties of the ANII. The licensee states that Surry has a multi-layered review process that performs the same functions as the ANII, 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.

As stated by the licensee, utilities have a multi-layered review process that performs the same functions as the ANII. ANIIs generally do not have the training or background experience to make determinations of the safety function of components in order to verify the scope of the IST Program, or assess the operational readiness of components based on test results. Therefore, in the 2000 Addenda to the 1998 Edition of the OM Code, the requirement for the ANII to verify the IST required on pumps, valves, and components has been completed and the results recorded was removed.

On the basis that the licensee's review process for its IST Program provides an equivalent or higher level of quality and safety as the Code requirements for ANII involvement, the staff finds that the proposed alternative is acceptable.

3.0 CONCLUSION

The staff concludes that the Relief Requests for Surry Units 1 and 2 (G-1) to eliminate from the IST program for pumps and valves the specific requirements for the ANII to verify the completion of required IST and the recording of results are authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the term of the operating licenses for these facilities on the basis that the alternative provides an acceptable level of quality and safety.

Principal Contributor: Y. S. Huang

Date: May 22, 2002

Mr. David A. Christian
Virginia Electric and Power Company

Surry Power Station

cc:

Ms. Lillian M. Cuoco, Esq.
Senior Nuclear Counsel
Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Building 475, 5th Floor
Rope Ferry Road
Rt. 156
Waterford, Connecticut 06385

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

Mr. Richard H. Blount, II
Site Vice President
Surry Power Station
Virginia Electric and Power Company
5570 Hog Island Road
Surry, Virginia 23883-0315

Mr. Stephen P. Sarver, Director
Nuclear Licensing & Operations Support
Innsbrook Technical Center
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

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

Mr. David A. Heacock
Site Vice President
North Anna Power Station
Virginia Electric and Power Company
P. O. Box 402
Mineral, Virginia 23117-0402

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

Mr. William R. Matthews
Vice President - Nuclear Operations
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, Virginia 23060-6711

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