

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

September 30, 2002

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

Serial No. 02-576  
NL&OS/GDM R0  
Docket Nos. 50-280  
License Nos. DPR-32

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNIT 1**  
**ASME SECTION XI INSERVICE INSPECTION PROGRAM**  
**RELIEF REQUEST CMP-28**  
**EXTENSION OF REACTOR VESSEL INSPECTION SCHEDULE**

Surry Power Station Unit 1 is presently in the third period of the third ten-year inservice inspection interval with examinations conducted in accordance with the requirements of the 1989 Edition of the ASME Section XI Code. Relief is requested to extend the inspection interval for performing the Surry Unit 1 reactor vessel examinations beyond the one-year Code allowable extension to coincide with the Fall 2004 refueling outage. Approval of Relief Request CMP-28 is requested pursuant to the provisions of 10 CFR 50.55a(a)(3)(ii).

The relief request is provided in the attachment and has been approved by the Station Nuclear Safety and Operating Committee. If you have any questions or require additional information, please contact us.

Very truly yours,



Leslie Hartz  
Vice President - Nuclear Engineering

Attachment

Commitments made in this letter: None

A047

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 Request CMP-28  
Extension of Reactor Vessel Inspection Schedule**

**Virginia Electric and Power Company  
(Dominion)  
Surry Power Station Unit 1**

**Relief Request CMP-28  
Surry Power Station Unit 1  
Reactor Vessel Inspection Extension**

**I. Identification of Components**

Category	Item	Description
B-A	B1.11	Circumferential Shell Weld
B-A	B1.12	Longitudinal Shell Weld
B-A	B1.30	Shell-to-Flange Weld
B-D	B3.90	Nozzle-to-Vessel Weld
B-D	B3.100	Nozzle Inside Radius Weld
B-G-1	B6.40	Flange Threads
B-N-1	B13.10	Reactor Vessel Internals
B-N-2	B13.50	Interior Attachments Within Beltline
B-N-2	B13.60	Interior Attachments Beyond Beltline
B-N-3	B13.70	Removable Core Support Structure
R-A	R1.11	Dissimilar Metal NPS 4 or Larger

**II. Code Requirements**

Surry Unit 1 currently conducts inservice inspection examinations in accordance with the requirements of the 1989 edition of ASME Section XI. Subparagraph IWA-2430(a) states, "The inservice examinations and system pressure tests required by IWB, IWC, IWD, and IWE shall be completed during each of the inspection intervals for the service lifetime of the power unit." Subparagraph (d) states, "For components inspected under Program B, each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals."

### III. Basis of Relief Request

Currently, Surry Power Station Unit 1 is in the third period of the third 10-year inservice inspection interval. The end date for the interval is October 13, 2003. As allowed by ASME Section XI, Virginia Electric and Power Company (Dominion) was planning to use the Code allowable one-year extension noted in Section II above to complete the third interval during the Fall 2004 refueling outage, which was not anticipated to exceed the one-year extension. As such, it was not expected that Code relief would be required.

However, due to recent industry events and plant specific reactor vessel head inspections, Dominion is now planning to replace the Surry Unit 1 reactor vessel head during the Fall/Winter 2004 (cycle 19) refueling outage. Due to the head replacement activities for Surry Unit 1, a later outage schedule start date is now being planned to facilitate head delivery and preparation work for the replacement. Furthermore, a longer outage duration is being planned due to the increased work scope. The later outage schedule start date will likely result in the reactor vessel examinations being performed beyond the Code allowable one-year extension period. Consequently, relief is required to perform the third interval reactor vessel examinations beyond the Code allowable one-year extension period but no later than December 31, 2004. (The fourth inservice inspection interval start date will remain as October 14, 2003.)

The previous 10-year reactor vessel examinations were completed on February 1, 1994. Considering the Code allowed one-year extension, the time between successive exams (February 1, 1994 to December 31, 2004) will still be less than the eleven years allowed by the Code. Therefore, performing the examinations during the Fall/Winter 2004 refueling outage will continue to ensure that the reactor vessel will be inspected within the time frame allowed by the ASME Code. If relief were not granted, the unit would have to be taken offline a month or more earlier than necessary to perform the reactor vessel inservice examinations, and the schedule for replacing the reactor vessel head would be detrimentally affected as well. Consequently, performing the reactor vessel examinations at the Code required frequency discussed in Section II above is considered a hardship without any compensating increase in quality or safety.

### IV. Alternate Provisions

Therefore, relief is requested pursuant to 10 CFR 50.55a(a)(3)(ii) to permit the proposed alternative of extending the time frame for performing the Surry Unit 1 reactor vessel examinations beyond the one-year Code allowable extension date, i.e., October 13, 2004, but no later than December 31, 2004.