

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

April 10, 2003

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

Serial No. 03-227  
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, REVISION 1**  
**EXTENSION OF REACTOR VESSEL INSPECTION SCHEDULE**

In a letter dated September 30, 2002 (Serial No. 02-576), Virginia Electric and Power Company (Dominion) requested relief 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. While this relief is still desired, the basis for the relief request has changed slightly due to the recent company decision to replace the Surry Unit 1 reactor vessel head during the upcoming Spring 2003 refueling outage. Consequently, the previously submitted Relief Request CMP-28 has been revised to reflect this change, and the revised relief request is provided in the attachment. Relief Request CMP-28, Revision 1, supercedes in its entirety Relief Request CMP-28 and has been approved by the Station Nuclear Safety and Operating Committee. Approval of Relief Request CMP-28, Revision 1, is requested pursuant to the provisions of 10 CFR 50.55a(a)(3)(ii).

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  
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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, Revision 1**  
**Extension of Reactor Vessel Inspection Schedule**

**Surry Power Station Unit 1**

**Virginia Electric and Power Company**  
**(Dominion)**

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

I. Identification of Components

<u>Category</u>	<u>Item</u>	<u>Description</u>
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 for Relief

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 one-year extension noted in Section II above to complete the third interval during the Fall 2004 refueling outage. This outage was not expected to exceed the one-year extension; consequently, it was not anticipated that Code relief would be required.

However, due to recent industry events and plant reactor vessel head inspections, Dominion is now planning to replace the Surry Unit 1 reactor vessel head during the Spring 2003 (Cycle 18) refueling outage. Consequently, the refueling outage schedule for Surry Unit 1 has been extended and the Fall 2004 outage start date has moved beyond the one year grace period. Relief is now 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.

Previous 10-year reactor vessel exams 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 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 off line earlier than necessary to perform the reactor vessel inservice examinations. 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

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 of October 13, 2004, but no later than December 31, 2004.