VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

May 6, 2003

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. 03-312 NL&OS/ETS R0 Docket Nos. 50-338/339 50-281 License Nos. NPF-4/7 DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION UNITS 1 AND 2 SURRY POWER STATION UNIT 2 REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA OF ASME SECTION XI FOR QUALIFICATION OF EXAMINATION PERSONNEL

10 CFR 50.55a(g)(4)(iv) permits the use of subsequent editions and addenda of ASME Section XI (Code), subject to its endorsement by the regulations in paragraph 10 CFR 50,55a(b) and approval by the Commission. It also allows the use of portions of editions and addenda provided that all related requirements of the respective editions and addenda are met. Currently paragraph 10 CFR 50.55a(b) of the regulations endorses the 1998 Edition through the 2000 Addenda of ASME Section XI with certain modifications and limitations. Pursuant to 10 CFR 50.55a(g)(4)(iv) Virginia Electric and Power Company (Dominion) requests approval to use the 1998 Edition through the 2000 Addenda of ASME Section XI, subsection IWA-2300, including references CP-189 1995 Edition, Appendix VI and Appendix VII and any rule modification and limitation, to establish the examiner qualification requirements for North Anna Units 1 & 2. Surry Unit 2, and the Surry and North Anna Containment programs. It is our position that IWA-2300 of the Code, including references CP-189 - 1995, Appendix VI and Appendix VII, contain the related portions associated with examiner gualification, and only these sections of the Code would be affected. The VT-1, VT-2, VT-3 examination requirements will be maintained and not the General Visual and Detailed Visual requirements for IWE of the later Code. Using common examiner qualification requirements will result in resource flexibility and eliminate unnecessary administrative burden associated with multiple tracking of examiner qualification by station or program.

Surry Unit 1 will be entering its fourth inspection interval on October 14, 2003 using the 1998 Edition through the 2000 Addenda of ASME Section XI as the basis for the ISI Program. Surry Unit 2 is currently in the third inspection interval using the 1989 Edition of ASME Section XI until its fourth interval update on May 10, 2004, when it will also update to the 1998 Edition through the 2000 Addenda of ASME Section XI. North Anna Unit 1 is in its third interval utilizing the 1989 Edition of ASME Section XI including CP-189 – 1991 and does not require a ISI program update until May 1, 2009. North Anna Unit 2 is in its third interval utilizing the 1995 Edition through the 1996 Addenda of

ASME Section XI and does not require a program update until December 14, 2010. The containment programs (IWE & IWL) for each of the four units currently use the 1992 Edition and the 1992 Addenda of ASME Section XI and are on separate inspection intervals (1st interval IWE and 2nd interval IWL).

In order to effectively schedule and use Dominion inspection personnel, we request NRC approval by October 14, 2003, consistent with the start of the Surry Unit 1 fourth interval. The use of the 1998 Edition through the 2000 Addenda of ASME Section XI, subsection IWA-2300, including references CP-189 1995 Edition, Appendix VI and Appendix VII, is requested for the remainder of the three units' inservice inspection intervals and the four units' containment inspection intervals. If you have any further questions or require additional information, please contact us.

Very truly yours,

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Leslie N. Hartz Vice President – Nuclear Engineering

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission Region II Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Suite 23 T85 Atlanta, Georgia 30303-8931

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