VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

September 17, 2003

U.S. Nuclear Regulatory Commission

Attention: Document Control Desk

Washington, D.C. 20555

Serial No.:

03-312B

NL&OS/ETS

Docket Nos.: 50-338/339

50-280/281

License Nos.: NPF-4/7

DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)

NORTH ANNA POWER STATION UNITS 1 AND 2

SURRY POWER STATION UNITS 1 AND 2

REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA OF ASME SECTION XI

FOR QUALIFICATION OF EXAMINATION PERSONNEL

REQUEST FOR ADDITIONAL INFORMATION

In a May 6, 2003 letter (Serial No. 03-312) as supplemented in a June 12, 2003 letter (Serial No. 03-0312A), Dominion requested the use of a subsequent Code edition and addenda of ASME Section XI (Code) to establish examiner qualification requirements. This request was for the North Anna Units 1 & 2, Surry Unit 2 ISI programs, and the Surry Units 1 and 2 and North Anna Units 1 and 2 Containment ISI programs. 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. In a September 8, 2003 phone call, the NRC staff requested additional information to complete the review. The attachment to this letter provides the requested information.

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, Appendix VII, and Appendix VIII (as discussed in the attachment) 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 Mr. Tom Shaub at (804) 273-2763.

Very truly yours,

Vice President - Nuclear Engineering

Attachment

Commitments made in this letter: None

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Attachment

Responses to Request for Additional Information Qualification of Examination Personnel

Virginia Electric and Power Company (Dominion) North Anna Power Station Units 1 and 2 Surry Power Station Units 1 and 2

Request for Additional Information Qualification of Examination Personnel

NRC Question 1

Appendix VII, paragraph VI-4310B, references Appendix VIII qualification for the practical examination. Discuss the applicability of Appendix VIII to proposed changes.

Response

In addition to the changes referenced in our proposed request, Dominion intends to update our Appendix VIII program to coincide with the same Edition and Addenda of Section XI (1998 Edition with Addenda through 2000).

NRC Question 2

Appendix VII, paragraph VII-4310 references IWB-3500. Explain the difference between the current ISI Code and the proposed change on personnel qualification to ASME Section XI, Appendix VII.

Response

Appendix VII to ASME Section XI, paragraph VII-4310 requires if simulated flaws are used in the test specimens for qualification of ultrasonic examination personnel that the simulated flaws not exceed the requirements of IWB-3500. Alternatively, VII-4310 allows the use of test specimens that meet the requirements of ASME Section XI, Appendix VIII or actual flaws. Dominion currently uses test specimens with actual flaws or Appendix VIII test specimens to qualify ultrasonic examination personnel to Appendix VII and we will continue this practice in the future. The test specimens used by Dominion for qualification of ultrasonic examination personnel meet the requirements of the 1998 Edition of ASME Section XI, Appendix VII, paragraph VII-4310, as well as all previous Editions and Addenda of Section XI back to the 1989 Edition.