

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 18, 2005

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 05-324
SPS-LIC/CGL R0
Docket Nos. 50-281
License Nos. DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 2
REQUEST TO USE LATER EDITION OF ASME SECTION XI CODE FOR
REPAIR/REPLACEMENT ACTIVITIES ON MAIN STEAM BRANCH LINES

Surry Power Station Unit 2 is currently in the fourth ten-year Inservice Inspection (ISI) Interval and uses the 1998 Edition of the ASME Section XI Code through the 2000 Addenda. As permitted by 10CFR50.55a(g)(4)(iv) and as clarified in Regulatory Issue Summary (RIS) 2004-16, "Use of Later Editions and Addenda to the ASME Code Section XI for Repair/Replacement Activities," this letter requests NRC approval to apply the following portion of a later ASME Code Addenda to the Surry Unit 2 Fourth Inspection Interval Repair/Replacement Plan, as detailed in the attachment:

ASME Section XI, 2001 Edition, through 2003 Addenda, Subsubarticle IWA-4540,
PRESSURE TESTING OF CLASSES 1, 2, AND 3 ITEMS

Virginia Electric and Power Company (Dominion) requests expeditious approval to use the later ASME Code Addenda to permit startup of Unit 2 from Cold Shutdown conditions related to the current refueling outage.

Very truly yours,


for

D. E. Jernigan
Site Vice President

Commitments made in this letter: None.

AC47

cc: U. S. Nuclear Regulatory Commission
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**Use of Later ASME Code Edition and Addenda
In Accordance with 10CFR50.55a(g)(4)(iv) for Repair/Replacement Activities**

Dominion requests approval to apply those portions of ASME Section XI identified in Section 4.0 below for the circumstances detailed in Section 2.0 below.

1.0 ASME Code Component(s) Affected

ASME Class 2 branch connections consisting of three 6 inch diameter (1 inch thick) weldolets attached to the 30 inch main steam line on each of three Unit 2 main steam lines.

2.0 Circumstances Necessitating Use of Later Code

The hydrostatic test required by Subsubarticle IWA-4540 is not practical.

The original nondestructive examination (NDE) requirements for the 6 inch branch connection to 30 inch main steam lines was a final surface examination (MT) in accordance with B31.1-1967. During the current Unit 2 refueling outage, the existing 6 inch diameter connections were replaced with weldolets. NDE (MT) was successfully performed on the root, half way welded out, and on the final weld.

Radiography of the three weldolets would require approximately 48 exposures for each weld and installation of gamma ports into the 30 inch piping to facilitate the radiography process. A double wall radiography is not feasible with the weldolet configuration. Even with the large number of exposures, 100% coverage would not be attained.

3.0 Applicable Code Edition and Addenda

ASME Section XI, 1998 Edition through the 2000 Addenda, Subsubarticle IWA-4540.

4.0 Later Code Use Requested

ASME Section XI, 2001 Edition through 2003 Addenda, Subsubarticle IWA-4540, for the 6 inch diameter weldolets.

5.0 Related Requirements

Related requirements in Article IWA-5000 and Subsubarticle IWA-4221 are satisfied as required by Subsubarticle IWA-4540.