10 CFR 50.55a

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 17, 2013

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

Serial No. 13-352
NAPS/JHL R0'
Docket Nos. 50-338, 339
License Nos. NPF-4, 7

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2
ASME INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES
REQUEST FOR ALTERNATIVE TO REQUIREMENTS OF ASME OM CODE
REQUEST FOR ALTERNATIVE G-1

Pursuant to 10 CFR 50.55a(a)(3)(ii), Dominion requests an alternative from the inservice testing (IST) requirements of American Society Mechanical Engineers (ASME) OM Code, for North Anna Power Station Units 1 and 2. Regulatory Issue Summary 2012-10, *NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests*, indicates that Surveillance Requirements (SRs) 3.0.2 and 3.0.3 cannot be applied to Technical Specification (TS) 5.5 for tests that are not associated with a TS SR. The lack of a tolerance band on the ASME OM Code inservice test frequency restricts operational flexibility. Thus, just as with TS required surveillance testing, some tolerance is needed to allow adjusting OM Code testing intervals to suit the plant conditions and other maintenance and testing activities. The proposed alternative from the frequency specifications of the ASME OM Code is needed due to undue hardship without a compensating increase in the level of quality or safety. The proposed alternative for North Anna Units 1 and 2 is provided in Attachments 1 and 2, respectively.

Dominion requests to implement this alternative for the remainder of the fourth ten year IST interval for North Anna Power Station Units 1 and 2.

If you have any questions or require additional information, please contact Mr. Thomas Shaub at (804) 273-2763.

Respectfully,

E. S. Grecheck
Vice President – Nuclear Engineering and Development

Commitments made in this letter: None

Attachments
1. North Anna Power Station Unit 1 Request for Alternative G-1
2. North Anna Power Station Unit 2 Request for Alternative G-1

A047
NRR

cc: U.S. Nuclear Regulatory Commission
Region II
Marquis One Tower
245 Peachtree Center Avenue, NE
Suite 1200
Atlanta, Georgia 30303-1257

Mr. J. E. Reasor, Jr.
Old Dominion Electric Cooperative
Innsbrook Corporate Center
4201 Dominion Blvd.
Suite 300
Glen Allen, Virginia 23060

NRC Senior Resident Inspector
North Anna Power Station

Ms. K. R. Cotton
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O-8 G9A
11555 Rockville Pike
Rockville, Maryland 20852

Dr. V. Sreenivas
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop 08 G-9A
11555 Rockville Pike
Rockville, MD 20852-2738

ATTACHMENT 1

NORTH ANNA POWER STATION UNIT 1
INSERVICE TESTING PROGRAM
FOURTH TESTING INTERVAL

REQUEST FOR ALTERNATIVE G-1

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
NORTH ANNA POWER STATION UNIT 1

NORTH ANNA POWER STATION UNIT 1
REQUEST FOR ALTERNATIVE G-1
INSERVICE TESTING PROGRAM FOURTH TESTING INTERVAL

Proposed Alternative in Accordance with 10CFR50.55a(a)(3)(ii)
--Hardship or Unusual Difficulty Without Compensating Increase in Level of Quality or Safety.--

1.0 ASME CODE COMPONENTS AFFECTED

All pumps and valves contained within the Inservice Testing Program scope.

2.0 APPLICABLE CODE EDITION AND ADDENDA

ASME OM Code, 2004 Edition

3.0 APPLICABLE CODE REQUIREMENTS

This request applies to the frequency specifications of the ASME OM Code. The frequencies for tests given in the ASME OM Code do not include a tolerance band.

Code Paragraph	Description
ISTA-3120(a)	"The frequency for the inservice testing shall be in accordance with the requirements of Section IST."
ISTB-3400	Frequency of Inservice Tests
ISTC-3510	Exercising Test Frequency
ISTC-3540	Manual Valves
ISTC-3630(a)	Frequency
ISTC-3700	Position Verification Testing
ISTC-5221 (c)(3)	"At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in a group shall be disassembled and examined at least once every 8 years."
Appendix I, I-1320	Test Frequencies, Class 1 Pressure Relief Valves
Appendix I, I-1330	Test Frequencies, Class 1 Nonreclosing Pressure Relief Devices
Appendix I, I-1340	Test Frequencies - Class 1 Pressure Relief Valves that are used for Thermal Relief Application
Appendix I, I-1350	Test Frequencies - Class 2 and 3 Pressure Relief Valves
Appendix I, I-1360	Test Frequencies - Class 2 and 3 Nonreclosing Pressure Relief Devices
Appendix 1, I-1370	Test Frequencies - Class 2 and 3 Primary Containment Vacuum Relief Valves

Code Paragraph	Description
Appendix I, I-1380	Test Frequencies - Class 2 and 3 Vacuum Relief Valves Except for Primary Containment Vacuum Relief Valves
Appendix I, I-1390	Test Frequencies - Class 2 and 3 Pressure Relief Valves that are used for Thermal Relief Application
Appendix II, II-4000(a)(1)	Performance Improvement Activities Interval
Appendix II, II-4000(b)(1)(e)	Optimization of Condition Monitoring Activities Interval

4.0 REASON FOR REQUEST

Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (a)(3)(ii), relief is requested from the frequency specifications of the ASME OM Code. The basis of the relief request is that the Code requirement presents an undue hardship without a compensating increase in the level of quality or safety.

ASME OM Code Section IST establishes the inservice test frequency for all components within the scope of the Code. The frequencies (e.g., quarterly) have always been interpreted as "nominal" frequencies (generally as defined in Table 3.2 of NUREG 1482, Revision 1), and Owners applied the surveillance extension time period (i.e., grace period) contained in the plant Technical Specifications (TS) Surveillance Requirements (SRs). The TS allow for a less than or equal to 25% extension of the surveillance test interval to accommodate plant conditions that may not be suitable for conducting the surveillance (TS 3.0.2). However, Regulatory Issue Summary 2012-10, *NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests*, states that SR 3.0.2 and 3.0.3 cannot be applied to TS 5.5 for tests that are not associated with a TS SR.

The lack of a tolerance band on the ASME OM Code inservice test frequency restricts operational flexibility. There may be times when a surveillance test could be required (i.e., its frequency could expire), but plant conditions are not risk conducive or the testing may not even be possible until sometime after a plant condition or associated Limited Condition Operation (LCO) is within its applicability.

The NRC recognized this potential issue in the TS by allowing a frequency tolerance as described in TS 3.0.2. The lack of a similar tolerance applied to OM Code testing places an unusual hardship on the plant to adequately schedule work tasks without operational flexibility.

Thus, just as with TS required surveillance testing, some tolerance is needed to allow adjusting OM Code testing intervals to better align with the plant conditions and other maintenance and testing activities. Providing a tolerance band assures operational flexibility for scheduling surveillance tests to minimize conflicts between the need to complete the surveillance and plant conditions.

5.0 PROPOSED ALTERNATIVE AND BASIS FOR USE

Code Case OMN-20 is included in the ASME OM Code, 2009 Edition and will be used as the alternative to the frequencies of the ASME OM Code.

The requirements of Code Case OMN-20 are described below.

ASME OM Division: 1 Section IST and earlier editions and addenda of ASME OM Code specify component test frequencies based either on elapsed time periods (e.g., quarterly, 2 years, etc.) or based on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance, etc.).

a) Components whose test frequencies are based on elapsed time periods shall be tested at the frequencies specified in Section IST with a specified time period between tests as shown in the table below. The specified time period between tests may be reduced or extended as follows:

    1) For periods specified as less than 2 years, the period may be extended by up to 25% for any given test.

    2) For periods specified as greater than or equal to 2 years, the period may be extended by up to 6 months for any given test.

    3) All periods specified may be reduced at the discretion of the owner (i.e., there is no minimum period requirement).

Period extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test or maintenance activities). Period extensions are not intended to be used repeatedly merely as an operational convenience to extend test intervals beyond those specified.

Period extensions may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) and other less than two year test frequencies not specified in the table below.

Period extensions may not be applied to the test frequency requirements specified in Subsection ISTD, *Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-water Reactor Nuclear Power Plants*, as Subsection ISTD contains its own rules for period extensions.

Frequency	Specified Time Period Between Tests
Quarterly (or every 3 months)	92 days
Semiannually (or every 6 months)	184 days
Annually (or every year)	366 days
x Years	x calendar years where 'x' is a whole number of years ≥ 2

b) Components whose test frequencies are based on the occurrence of plant conditions or events may not have their period between tests extended except as allowed by ASME OM Division: 1 Section IST 2009 Edition through OMa-2011 Addenda and earlier editions and addenda of ASME OM Code.

6.0 DURATION OF PROPOSED ALTERNATIVE

The proposed alternative in this request, if approved, will be applicable for the remainder of the North Anna Power Station Unit 1 Fourth Ten Year Inservice Testing Interval.

7.0 PRECEDENTS

Request Number RV-01 for Quad Cities Units 1 and 2 was approved by the NRC by letter dated 2/14/2013 (TAC Nos. ME7981 through ME7988, ME7990 through ME7995.)

8.0 REFERENCES

1. ASME OM Code, 2004 Edition
2. North Anna TS Paragraph 3.0.2
3. North Anna TS 5.5.7, Inservice Testing Program
4. Regulatory Issue Summary 2012-10, NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests

ATTACHMENT 2

NORTH ANNA POWER STATION UNIT 2
INSERVICE TESTING PROGRAM
FOURTH TESTING INTERVAL

REQUEST FOR ALTERNATIVE G-1

NORTH ANNA POWER STATION UNIT 2
REQUEST FOR ALTERNATIVE G-1
INSERVICE TESTING PROGRAM FOURTH TESTING INTERVAL

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6.0 DURATION OF PROPOSED ALTERNATIVE

The proposed alternative in this request if approved will be applicable for the remainder of the North Anna Power Station Unit 2 Fourth Ten Year Inservice Testing Interval.

7.0 PRECEDENTS

Request Number RV-01 for Quad Cities Units 1 and 2 was approved by the NRC by letter dated 2/14/2013 (TAC Nos. ME7981 through ME7988, ME7990 through ME7995.)

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1. ASME OM Code, 2004 Edition
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