

## **NRR-PMDAPEm Resource**

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**From:** Sreenivas, V  
**Sent:** Friday, January 24, 2014 9:22 AM  
**To:** 'david.heacock@dom.com'  
**Cc:** 'Tom Shaub'; 'david.sommers@dom.com'; Pascarelli, Robert; Cotton, Karen; 'Gary D Miller'  
**Subject:** NORTH ANNA: REQUEST FOR ADDITIONAL INFORMATION (RAI)- Relief Request (RR)  
Related to Alternative to Requirements of ASME Boiler and Pressure Vessel Code  
"Alternative – IWE1

REQUEST FOR ADDITIONAL INFORMATION (RAI)  
REGARDING THE REQUEST FOR ALTERNATIVE TO IWE-5240 REQUIREMENTS  
VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)  
NORTH ANNA POWER STATION UNITS 1 AND 2  
DOCKET NOS. 50-338/339

By letter dated December 18, 2013. (ML13365A060), Virginia Electric and Power Company (Dominion), requests a RR to the Renewed Facility Operating License (FOL) Numbers DPR-32, DPR-37 for North Anna Power Station (NAPS) Units 1 and 2. The proposed request is for Alternative to Requirements of ASME Boiler and Pressure Vessel Code, "Cases of ASME Boiler and Pressure Vessel Code, Case N-649, "Alternative Requirements for IWE-5240 Visual Examination, Section XI, Division 1," March 28, 2001. The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's detailed technical review of this request. Please submit the additional information requested below to complete its detailed technical review.

American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Paragraph IWE-5220, "System Pressure Tests: Tests Following Repair / Replacement Activities," requires, in part, that, "repair / replacement activities performed on the pressure retaining boundary of Class MC or Class CC components shall be subjected to a pneumatic leakage test ..."

Section 5.0 of Reference 1 states that, "a detailed visual examination in accordance with IWE-2310 prior to the Appendix J pressure test is adequate to assess the condition of the surfaces affected by repair/replacement activities and to determine the magnitude and extent of any deterioration and distress of these surfaces." No discussion is provided in Reference 1 of visual examinations conducted on areas affected by repair/replacement activities after the pressure test.

Paragraph (b) of Reference 2 states in part, "when the pressure test is performed, the requirements of the above paragraph shall be met." The "above paragraph" refers to Paragraph (a) which states in part "... [visual examination] shall be performed during or after the pressure test on the areas affected by the repair/replacement activity."

Explain how the requirements of ASME Code Case N-649, for a visual examination of areas affected by repair/replacement activities during or after the required pressure test, will be met.

Please submit the response to these RAIs by February 24, 2014. If you have any questions please contact me at your earliest.

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