VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

November 5, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No. 628
NO/RMT:rmt
Docket No. 50-281
License No. DPR-37

Gentlemen:

Surry Power Station Unit 2 will be performing a design change to the three inch Auxiliary Feedwater piping to each steam generator during the upcoming Refueling Outage. The piping involved is ASME Code Class 2, and the applicable code for the repair is ASME Section XI 1974 edition with addenda through summer 1975. In accordance with 10CFR 50.55a, paragraph g (5), we are requesting relief from hydrostatic test requirements for the welded joints going to A & B Steam Generators. "C" Steam Generator will undergo hydrostatic testing for work on the shell and the Auxiliary Feedwater weld joints will be included.

The following justification is provided for the relief from hydrostatic test requirements on A & B Auxiliary Feedwater piping joints:

1.) The locations of the welded joints (four total) are unisolable from the steam generators, thus a complete secondary side hydrostatic test would be required. Only five (5) such test cycles are designed into the steam generators.

2.) 100% radiography and ultrasonic testing of all new joints will be substituted as an alternate examination method. Additionally, an inservice leak test at hot shutdown will be performed.

3.) We have discussed this approach with Ricky Smith, the Assistant Chief from Hartford Steam Boiler Inspection and Insurance Company, and he expressed concurrence.

It is our position that no reduction in the level of quality will result from this substitution and that the use of one of the remaining four secondary hydrostatic test cycles is therefore unwarranted.

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Very truly yours,

R. H. Leasburg

cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement