

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

R. H. LEASBURG  
VICE PRESIDENT  
NUCLEAR OPERATIONS

September 15, 1982

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

Serial No. 530  
NO/RMT:acm  
Docket No. 50-280  
License No. DPR-32

Gentlemen:

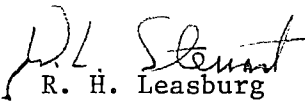
Surry Power Station Unit 1 will be performing a repair within a system boundary designated as ASME Class 2 during the upcoming maintenance outage scheduled to begin October 2. Pursuant to 10 CFR 50.55a paragraph g(5), relief is requested from certain post repair test requirements delineated in ASME Section XI. The following basis is provided.

Specifically, it is planned to replace a 1 1/2 inch drain valve which is just upstream of the main steam trip valve (drawing attached). The governing code, ASME XI 77W78, requires a hydrostatic test for such a repair/replacement. As evidenced by the attached drawing this would require a hydrostatic test of the entire steam generator and a considerable portion of large main steam piping. Thus, a hydrostatic test would be especially difficult and impractical.

Alternate testing proposed is liquid penetrant and visual examination supplemented by an inservice leakage test at hot shutdown which is approximately 125% of normal operating pressure.

We contend that adequate basis for relief is presented above and that the proposed alternate testing provides adequate assurance of the integrity of the two 1 1/2 inch welds affected.

Very truly yours,

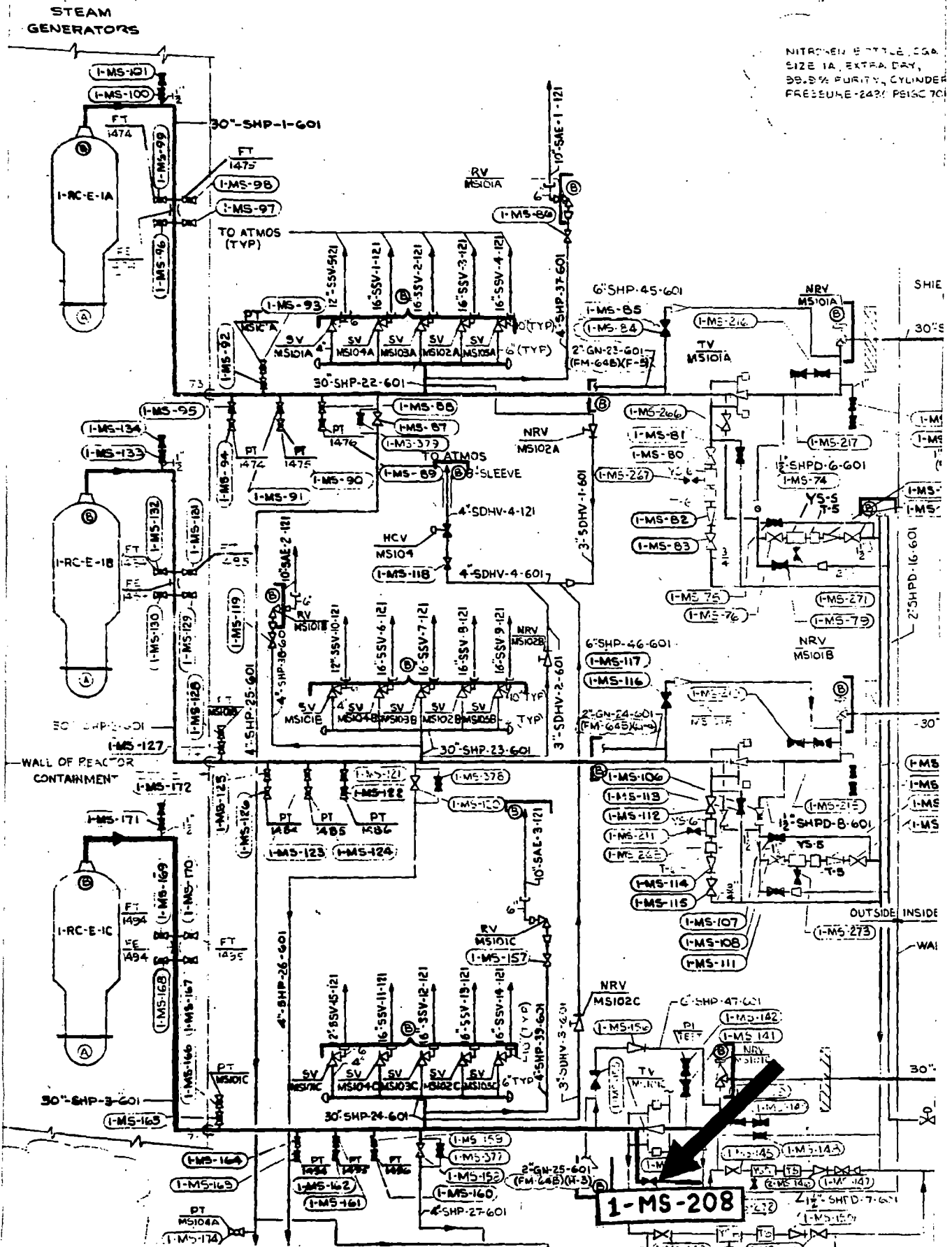
  
R. H. Leasburg

Enclosure

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

A001

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PDR ADDCK 05000280  
P PDR



NITROGEN BOTTLE, 250A,  
SIZE 1A, EXTRA DRY,  
99.9% PURITY, CYLINDER  
PRESSURE 2431 PSIG 701