

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

April 12, 1984

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. 201
NO/JDH:acm
Docket No. 50-281
License No. DPR-37

Gentlemen:

ASME XI RELIEF REQUEST
SURRY POWER STATION UNIT 2

Surry Power Station Unit 2 is performing several repair and replacement actions within systems designated ASME Class 2 during the scheduled maintenance outage which began on March 16, 1984. As discussed in our March 16 and 19 telecon between Mrs. W. D. Craft, Vepco, and Mr. J. D. Neighbors of your staff, and pursuant to 10 CFR 50.55a paragraph g(5), relief is requested from certain post repair/replacement test requirements delineated in ASME Section XI. The following bases are provided:

1. Due to check valve leakage three, 3 inch check valves, 2-FW-27, 58, and 89 (Attachment 1), are required to be removed and repaired utilizing the rules of IWA 4000, IWA 7000 and IWC 7000 of ASME Section XI, 1980 edition W 1980 addenda. This action as defined in IWA 5214 requires a hydrostatic pressure test in accordance with IWC 5222. As evidenced by the attached drawings, this hydrostatic test would include all three main steam generators and a significant portion of the attached feedwater and main steam piping. As this test is considered extremely difficult and impractical, alternative inspection is proposed.

Upon reinstallation of the attachment welds a surface examination (liquid penetrant) will be conducted. In addition, a radiographic examination will augment the post repair inspection in lieu of the required pressure test.

2. Due to internal leakage, a 1-1/2 inch manual isolation valve, 2-MS-74 (Attachment 2), requires replacement utilizing the rules of IWA 7000 and IWC 7000 of ASME Section XI, 1980 edition W 1980 addenda. This replacement as defined in IWA 5214 requires a hydrostatic pressure test in accordance with IWC 5222. This test, if conducted, would include within the hydrostatic test boundaries the 'A' main steam generator and a large portion of the associated piping. This test, as previously stated, is considered difficult and impractical. As a result, alternative inspection is proposed.

8404200197 840412
PDR ADOCK 05000281
P PDR

Rec'd w/ check \$4,000

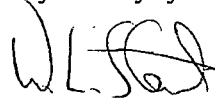
AD47
1/6

VIRGINIA ELECTRIC AND POWER COMPANY TO Harold R. Denton

A surface examination (liquid penetrant) will be conducted on the attachment welds. In addition, a system pressure test (IWC 5221) in conjunction with a VT-2 examination will be substituted for the required hydrostatic test.

The proposed alternative examination provides the necessary inspection and integrity assurance intended by the code, allows a more practical approach to post repair/replacement inspection, and is in conformance with previous requests associated with steam generator problems. Based on the above, relief should be granted. A check for \$4000 in payment of the technical review fee is attached.

Very truly yours,



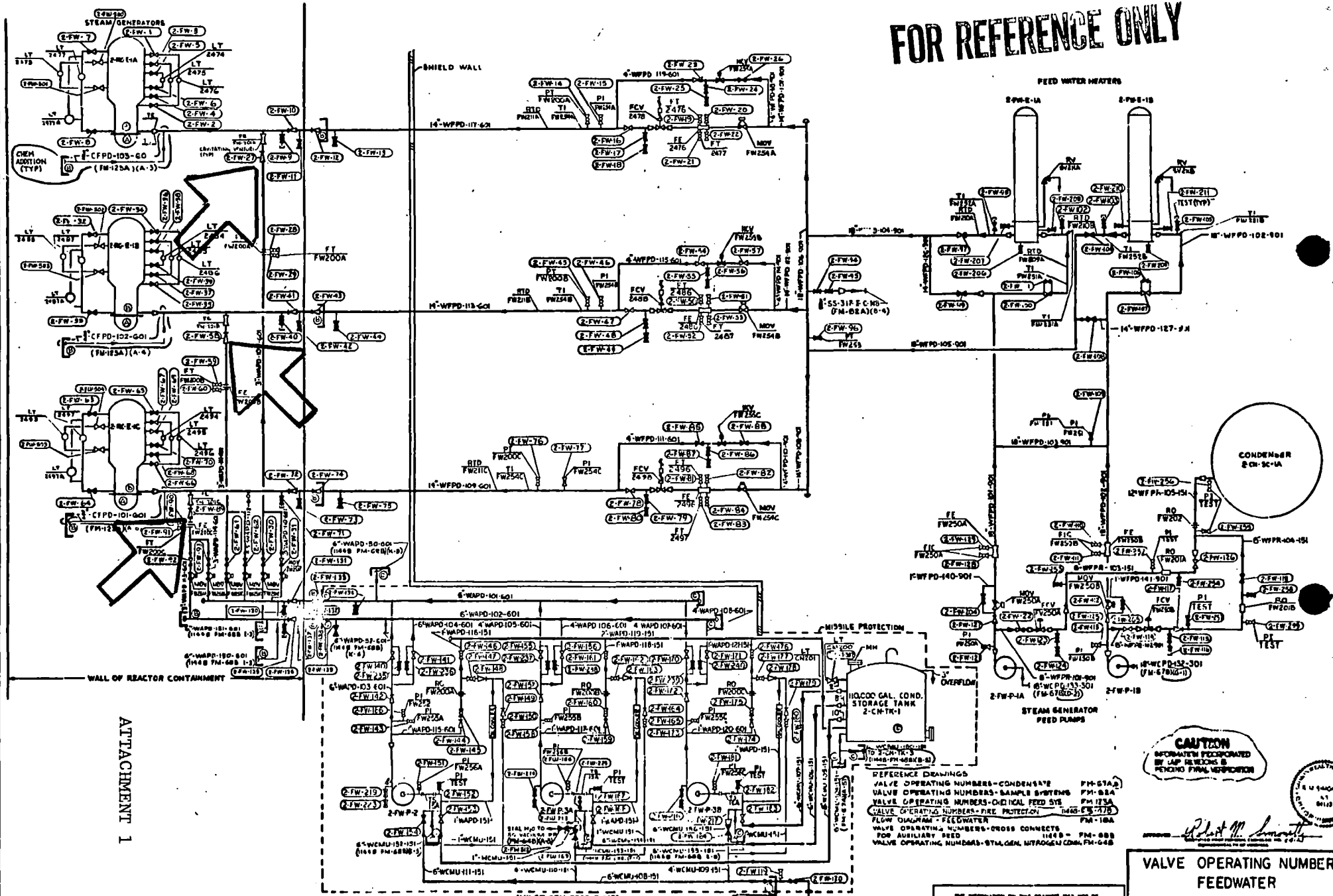
W. L. Stewart

Attachments (3)

cc: Mr. James P. O'Reilly
Regional Administrator
NRC Region II

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

FOR REFERENCE ONLY



ATTACHMENT 1

CAUTION
INFORMATION FURNISHED BY
THIS DRAWING IS FOR
REFERENCE ONLY

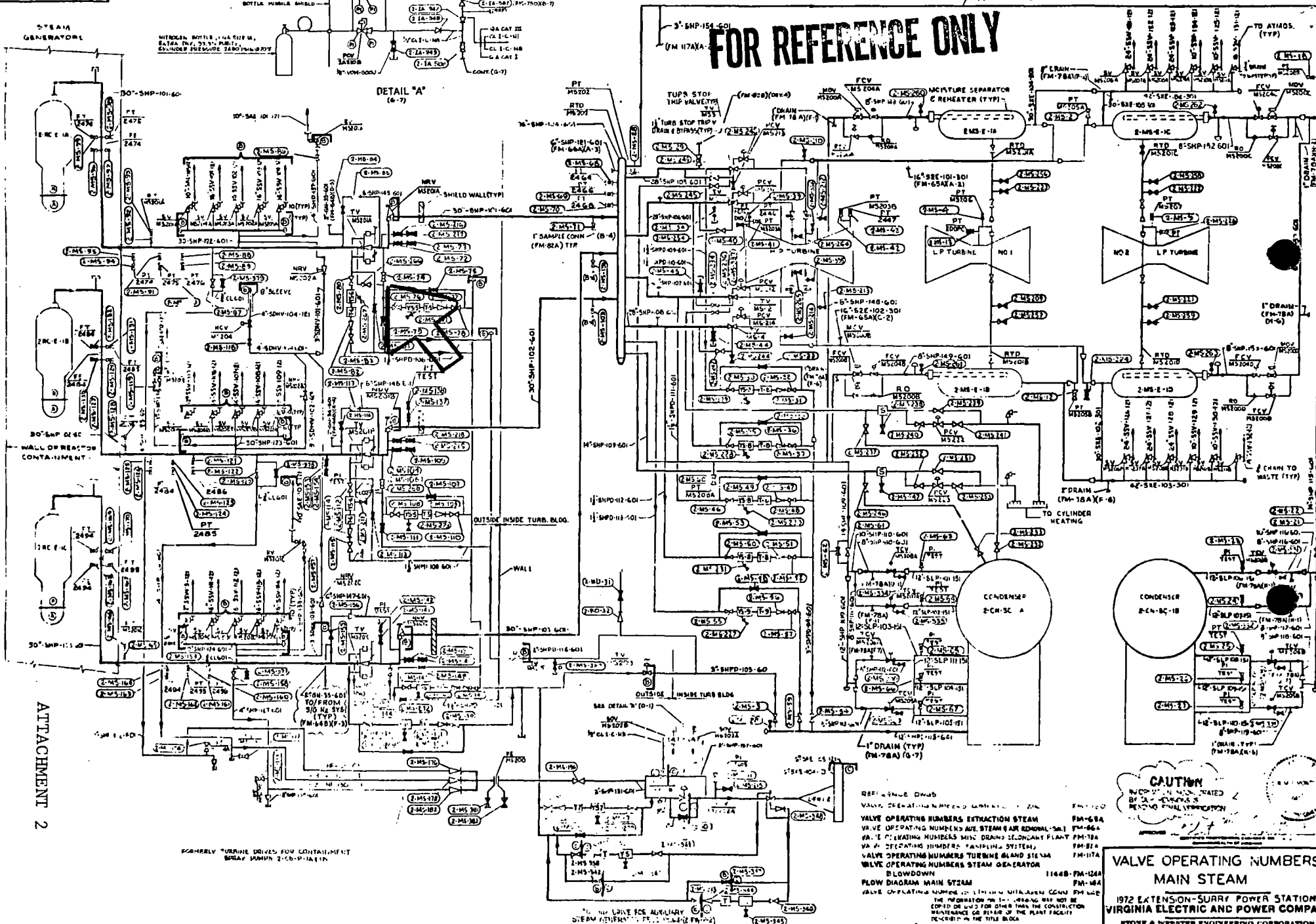
REFERENCE DRAWINGS
VALVE OPERATING NUMBERS-CONDENSATE PH-67A
VALVE OPERATING NUMBERS-SAMPLE SYSTEMS PH-68A
VALVE OPERATING NUMBERS-CHEMICAL FEED SYS PH-15A
VALVE OPERATING NUMBERS-FIRE PROTECTION PH-67B
FLOW DIAGRAM-FEEDWATER PH-10A
VALVE OPERATING NUMBERS-CROSS CONNECTS PH-68B
FOR AUXILIARY FEED 1144-B PH-68B
VALVE OPERATING NUMBERS-STA. GEN. NITROGEN COND. PH-64B

**VALVE OPERATING NUMBERS
FEEDWATER**

1972 EXTENSION-SURRY POWER STATION
VIRGINIA ELECTRIC AND POWER COMPANY
STONE & WEBSTER ENGINEERING CORPORATION
BOSTON, MASS.

THE INFORMATION ON THIS DRAWING MAY NOT BE
COPIED OR USED FOR OTHER THAN THE CONTRACTING
PURPOSES OR FOR THE PLANT FACILITY
DESCRIBED IN THE TITLE BLOCK

NO.	DESCRIPTION	DATE	BY	CHKD.	APP'D.	REVISION
1	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
2	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
3	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
4	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
5	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
6	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
7	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
8	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
9	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
10	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
11	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
12	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
13	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
14	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
15	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
16	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
17	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
18	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
19	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
20	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
21	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
22	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
23	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
24	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
25	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
26	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
27	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
28	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
29	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
30	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
31	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
32	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
33	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
34	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
35	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
36	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
37	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
38	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
39	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
40	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
41	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
42	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
43	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
44	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
45	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
46	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
47	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
48	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
49	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
50	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
51	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
52	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
53	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
54	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
55	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
56	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
57	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
58	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
59	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
60	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
61	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
62	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
63	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
64	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
65	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
66	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
67	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
68	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
69	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
70	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
71	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
72	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
73	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
74	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
75	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
76	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
77	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
78	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
79	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
80	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
81	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
82	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
83	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
84	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
85	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
86	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
87	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
88	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
89	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
90	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
91	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
92	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
93	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
94	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
95	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
96	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
97	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
98	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
99	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				
100	ADD VALVE: 2-FW-223 AS BUILT	11-19-70				



FOR REFERENCE ONLY

CAUTION
 INFORMATION CONTAINED
 HEREIN IS UNCLASSIFIED
 DATE 05-18-2011 BY 60322 UCBAW

**VALVE OPERATING NUMBERS
 MAIN STEAM**
 1972 EXTENSION-SURRY POWER STATION
 VIRGINIA ELECTRIC AND POWER COMPANY
 STONE & WEBSTER ENGINEERING CORPORATION
 BOSTON, MASS.

ATTACHMENT 2

NO.	DATE	DESCRIPTION	BY	CHKD	APP'D	REVISION
1	11-15-64	ISSUED FOR CONSTRUCTION
2
3