

May 3, 1985



VIRGINIA POWER

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. 85-305
NO/JDH:acm
Docket No. 50-281
License No. DPR-37

Gentlemen:

VIRGINIA POWER
SURRY POWER STATION UNIT NO. 2
ASME SECTION XI RELIEF REQUEST

Virginia Power is commencing final inservice examinations for its first 10 year interval on Surry Unit 2 as required by ASME Section XI. Pursuant to 10CFR50.55a paragraph g(5), relief is requested from certain code requirements concerning hydrostatic testing. The following basis is provided.

Paragraph IWC-2510 of ASME Section XI, 1974 Edition, Summer 1975 addenda, requires the performance of a hydrostatic test on Class 2 components. Components which are not exempt are required to be tested toward the end of the interval in accordance with IWC-2412(b).

During the Surry Unit 2 steam generator replacement (2/4/79-8/14/80), preservice pressure testing was conducted for the new steam generator components and attachment piping. A maximum test pressure of 1356 psig was attained in accordance with Westinghouse guidelines on test requirements. This test was completed under the cognizance of the Authorized Nuclear Inspector (Hartford Steam Boiler) and a Quality Control visual inspector. No significant leakage was observed during the testing. Because of the difficulty normally associated with hydrostatic testing of the steam generators and non-isolable piping and the need to minimize the number of these tests to meet Westinghouse guidelines, it is requested that the preservice test be accepted in lieu of the inservice test code requirement.

Certain sections of non-isolable piping in this preservice test were not documented as being inspected. However, since this piping was taken to the hydrostatic test pressure, it is requested that the required hydrostatic test not be repeated. Alternatively, supplemental examinations will be conducted as outlined below. Additionally, repairs or replacements involving welding on the pressure boundary are planned on non-isolable portions of the Blowdown System and Main Steam branch connections. These components do not exceed 2 inch nominal pipe size and generally perform a drain function when activated. The code requirements

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of IWA-5214, 1980 edition, winter 80 addenda, would require a hydrostatic test involving the steam generators because of the lack of intermediate valve isolation. As previously discussed, the difficult nature of this required test imposes an impractical burden, and it is requested that the following alternative arrangement be allowed.

It is proposed, in lieu of the inservice hydrostatic testing, that an inservice pressure test (IWC-5221) and the associated visual examination (VT-2) be conducted at a test pressure of approximately 1000 psig on the steam generator and associated piping. Note that this test would be conducted at the end of the outage (currently scheduled for mid-June, 1985) and would include all applicable repairs or replacements and piping/components not documented as being inspected in the preservice hydrostatic test. In addition, a visual (VT-1) examination and surface (Liquid Penetrant) examination will be conducted on repair or replacement pressure boundary welds.

Previously, Virginia Power has requested substitution of preservice examinations conducted during our steam generator replacement for inservice inspection on Surry Unit 1 (letter, W. L. Stewart to H. R. Denton, dated April 14, 1983, Serial No. 001B). This was approved by letter from the NRC on February 28, 1984. Additionally, repairs and replacements requiring post maintenance hydrostatic testing of the associated steam generator have similarly been submitted for approval of relief from code requirements (letter, W. L. Stewart to H. R. Denton, dated February 1, 1985, Serial No. 85-018). This was approved by letter from the NRC on April 11, 1985.

It is our opinion that approval of this relief request would eliminate costly and impractical test duplication. However, the alternative testing arrangement would provide the necessary inspection of component integrity.

In accordance with 10CFR170, an Application Fee of \$150 is enclosed.

Very truly yours,



W. L. Stewart

cc: Dr. J. Nelson Grace
Regional Administrator

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