

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

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U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Serial No. 87-056  
NO/ISI/vlh  
Docket Nos. 50-280  
50-281  
License Nos. DPR-32  
DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
SURRY POWER STATION UNITS 1 AND 2  
RELIEF REQUEST FROM ASME SECTION XI HYDROSTATIC TESTS

Pursuant to 10 CFR 50.55a paragraph g(5), relief is requested from certain post replacement test requirements identified in ASME Section XI, 1980 Edition, Winter 1980 Addenda for certain ASME Class 2 valve replacements. The following bases are provided.

From October 4 through December 2, 1986 Surry Unit 2 was shutdown for a refueling outage. During that outage, a 4 inch manual isolation valve, 2-MS-86, was replaced because of valve internal isolation problems. This valve is used to isolate the "A" steam generator PORV for maintenance. Replacement of the valve was considered the most appropriate resolution to the internal isolation problem.

IWA-5214 of ASME Section XI requires, following replacement welding, that a hydrostatic test (IWC-5222) be performed on the affected area. Because no intermediate isolation exists, this test would place the "A" steam generator (2-RC-E-1A) within the hydrostatic test boundary. Hydrostatic tests which include steam generators are extremely difficult and deemed impractical when compared to other possible alternatives.

It is proposed that the volumetric examination (RT) and the surface examination (PT) performed on the welds be accepted as an alternative to the Code required hydrostatic test. This approach is similar to a previous relief request dated April 12, 1984 and approved May 17, 1984. Additional assurance in the integrity of these welds can be provided because there was no leakage detected at startup nor during normal operations as part of the high energy line walkdowns.

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Surry Unit 1 is currently involved in a maintenance outage for secondary piping repair. A 2 inch steam generator nitrogen isolation valve, 1-GN-3, and a 1-1/2 inch main steam drain isolation valve, 1-MS-80, were replaced during this outage because of excessive body-to-bonnet steam leaks. Replacement of these valves offers the most economical solution in the harsh (main steam) environment. The code required hydrostatic test (IWC-5222) would place the "A" and "C" steam generators (1-RC-E-1A and 1-RC-E-1C) within the test boundary. As previously discussed, alternative examinations are preferred.

Since the socket welds preclude an adequate RT, it is requested that a surface examination (PT) and a visual examination (VT-2) performed during a system functional test (IWC-5221) be accepted as a substitute. This is similar to a previous relief request dated February 1, 1985 and approved April 11, 1985.

The proposed alternative examinations provide the necessary inspection and integrity assurance intended by the code. Acceptance of this request would be consistent with previous requests concerning small steam generator isolation valves.

In accordance with 10 CFR 170, an application fee of \$150 is enclosed.

Very truly yours,



W. L. Stewart

Attachments

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