

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 27, 1999

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 99-380A
NL&OS/GDM R0
Docket Nos. 50-280, 281
50-338, 339
License Nos. DPR-32, 37
NPF-4, 7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2
ASME SECTION XI RELIEF REQUESTS
CONTAINMENT LINER IWE-3

In a letter dated September 16, 1999 (Serial No. 99-380), pursuant to 10 CFR 50.55a, Virginia Electric and Power Company requested specific relief from certain containment liner examination requirements for North Anna and Surry Power Stations Units 1 and 2. As the result of a telephone conference call with the NRC staff, we are revising relief request IWE-3 to include an additional visual examination requirement after post-repair or modification pressure testing is completed. Please substitute the revised relief requests to complete your review.

The revised relief requests are included in Attachments 1 and 2 for North Anna and Surry Power Stations, respectively. Relief is requested from ASME Section XI, subsection IWE Code requirements based on proposed alternatives that would provide an acceptable level of quality and safety. The revised relief requests have been reviewed and approved by the respective Station Nuclear Safety and Operating Committees.

There are no new commitments made in this letter. If you have any questions concerning this request, please contact us.

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering and Services

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Attachments

cc: U. S. Nuclear Regulatory Commission
Region II
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61 Forsyth St., SW, Suite 23T85
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Mr. M. J. Morgan
NRC Senior Resident Inspector
North Anna Power Station

Mr. M. Grace
Authorized Nuclear Inspector
North Anna Power Station

Mr. R. Smith
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Mr. J. E. Reasor
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Innsbrook Corporate Center
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Attachment 1

**North Anna Power Station Units 1 and 2
ASME Section IX Relief Request IWE-3**

Virginia Electric and Power Company

**Virginia Electric & Power Company
North Anna Power Station Units 1 and 2
First Containment Inspection Interval**

Relief Request RR-IWE3

SYSTEM/COMPONENT(S) FOR WHICH RELIEF IS REQUESTED:

All components subject to the rules and requirements for repair, replacement or modification of Class MC, IWE-5000 system pressure testing visual examination in accordance with the 1992 Edition, 1992 Addenda of ASME Section XI.

CODE REQUIREMENT(S):

Paragraph IWE-5240 of the 1992 Edition, 1992 Addenda of ASME Section XI states that the requirements of Paragraph IWA-5240 for visual examination, VT-2 are applicable following repair, replacement, or modification.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from performing the VT-2 visual examination in connection with system pressure testing following repair, replacement or modification under Article IWE-5000.

BASIS FOR RELIEF:

Repair/replacements are performed in accordance with the Virginia Power Repair/Replacement Program which specifies the repair methods and nondestructive examinations necessary to ensure the original quality and construction requirements of the containment vessel are met.

ASME Section XI, Paragraph IWE-5210 states that except as noted within Paragraph IWE-5240, the requirements of Article IWA-5000 are not applicable to Class MC or Class CC components. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 (corrected from IWA-5246 to IWA-5240 in the 93 addenda) for visual examinations are applicable. Paragraph IWA-5240 identifies a "VT-2" visual examination. VT-2 examinations are conducted to detect evidence of leakage from pressure retaining components, with or without leakage collection systems, as required during the conduct of a system pressure test. In addition, personnel performing VT-2 examinations are required to be qualified in accordance with Subarticle IWA-2300 of ASME Section XI.

Table IWE-2500-1, Examination Category E-P, identifies the examination method of 10CFR50, Appendix J following each repair, modification, or replacement and does not specifically identify a VT-2 visual examination. 10CFR50, Appendix J provides requirements for testing as well as acceptable leakage criteria. These tests are performed by qualified Appendix J test personnel and utilize calibrated equipment to determine acceptability. Additionally, 10CFR50.55a(b)(2)(x)(E) requires a general visual examination of the containment each period that would identify any structural degradation that may contribute to leakage. A "VT-2" visual examination will not provide additional assurance of leak integrity beyond that provided by those examinations specified in current repair/replacement practices or 10CFR50 Appendix J requirements.

Relief is requested in accordance with 10CFR50.55a(a)(3)(i). Pressure testing in accordance with 10CFR50, Appendix J, provides an adequate level of quality and safety by assuring continued leak integrity.

ALTERNATIVE EXAMINATION(S):

A preservice visual examination (VT-3) will be performed on the repair/replacement. Testing and examination shall be conducted in accordance with 10CFR50, Appendix J as applicable. If a VT-2 examination cannot be performed in conjunction with the test, then a VT-1 examination will be performed after the test is completed.

Attachment 2

**Surry Power Station Units 1 and 2
ASME Section IX Relief Request IWE-3**

Virginia Electric and Power Company

**Virginia Electric & Power Company
Surry Power Station Units 1 and 2
First Containment Inspection Interval**

Relief Request RR-IWE3

SYSTEM/COMPONENT(S) FOR WHICH RELIEF IS REQUESTED:

All components subject to the rules and requirements for repair, replacement or modification of Class MC, IWE-5000 system pressure testing visual examination in accordance with the 1992 Edition, 1992 Addenda of ASME Section XI.

CODE REQUIREMENT(S):

Paragraph IWE-5240 of the 1992 Edition, 1992 Addenda of ASME Section XI requires that the requirements of Paragraph IWA-5240 for visual examination, VT-2 are applicable following repair, replacement, or modification.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from performing the VT-2 visual examination in connection with system pressure testing following repair, replacement or modification under Article IWE-5000.

BASIS FOR RELIEF:

Repair/replacements are performed in accordance with the Virginia Power Repair/Replacement Program which specifies the repair methods and nondestructive examinations necessary to ensure the original quality and construction requirements of the containment vessel are met.

ASME Section XI, Paragraph IWE-5210 states that except as noted within Paragraph IWE-5240, the requirements of Article IWA-5000 are not applicable to Class MC or Class CC components. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 (corrected from IWA-5246 to IWA-5240 in the 93 addenda) for visual examinations are applicable. Paragraph IWA-5240 identifies a "VT-2" visual examination. VT-2 examinations are conducted to detect evidence of leakage from pressure retaining components, with or without leakage collection systems, as required

during the conduct of a system pressure test. In addition, personnel performing VT-2 examinations are required to be qualified in accordance with Subarticle IWA-2300 of ASME Section XI.

Table IWE-2500-1, Examination Category E-P, identifies the examination method of 10CFR50, Appendix J following each repair, modification, or replacement and does not specifically identify a VT-2 visual examination. 10CFR50, Appendix J provides requirements for testing as well as acceptable leakage criteria. These tests are performed by qualified Appendix J test personnel and utilize calibrated equipment to determine acceptability. Additionally, 10CFR50.55a(b)(2)(x)(E) requires a general visual examination of the containment each period that would identify any structural degradation that may contribute to leakage. A "VT-2" visual examination will not provide additional assurance of leak integrity beyond that provided by those examinations specified in current repair/replacement practices or 10CFR50 Appendix J requirements.

Relief is requested in accordance with 10CFR50.55a(a)(3)(i). Pressure testing in accordance with 10CFR50, Appendix J, provides an adequate level of quality and safety by assuring continued leak integrity.

ALTERNATIVE EXAMINATION(S):

A preservice visual examination (VT-3) will be performed on the repair/replacement. Testing and examination shall be conducted in accordance with 10CFR50, Appendix J as applicable. If a VT-2 examination cannot be performed in conjunction with the test, then a VT-1 examination will be performed after the test is completed.