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SUBJECT: Forwards response to two NRC questions re ISI relief requests SR-14-17 & provides justification for approval.

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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 11, 1996

U.S. Nuclear Regulatory Commission
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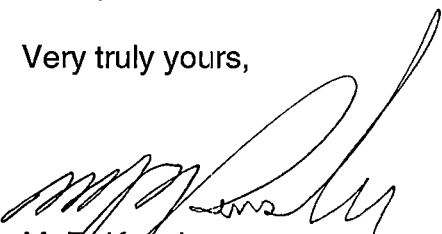
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 2
REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUESTS SR-14 THROUGH 17

Virginia Electric and Power Company has reviewed the two questions enclosed in your August 29, 1996 request for additional information regarding inservice inspection relief requests SR-14 through 17 for Surry Unit 2. These four relief requests provided justification for relief from the examination requirements of Code Case N-460 and ASME XI for five weld examinations where the coverage requirements could not be met. In addition, relief for four of the five welds was also requested from the requirements of ASME Section XI since the Code required examination coverage will not be possible for these exams during the second and third periods of the third ten year inspection interval. The attached response addresses the two NRC questions associated with inservice inspection relief requests SR-14 through 17 and provides further justification for their approval.

No new commitments are intended as a result of this letter. If you have any questions or require additional information, please contact us.

Very truly yours,



M. R. Kansler
Vice President - Nuclear Engineering and Services

Attachment

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Q PDR

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
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Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Attachment

Response to the NRC's Request for Additional Information Regarding ISI Relief Requests SR 14 through SR 17

Surry Power Station Unit 2

NRC Question No. 1

Request for Relief SR-14 addresses relief from preservice examination coverage as stated in the "Alternate Provisions." Is the subject request for relief based on a new weld? The Code requires a 100% volumetric examination. Has an alternate volumetric examination technique (radiography) been considered?

Virginia Power Response

Relief Request SR-14 is for a replacement weld that is obstructed by an adjacent branch connection. The original weld was cut out to facilitate a valve replacement. The Code does not require that the plant be modified or re-designed to allow accessibility of a weld when components are replaced. The replacement weld was subjected to radiographic and surface examinations in accordance with the applicable construction code. There were no limitations imposed on these examinations from a construction code standpoint. However, the film density on the valve side of the weld will not meet Section XI code density requirements for the entire volumetric examination area, i.e., a distance of one-quarter inch from the toe of the weld. The volumetric examination area is defined by ASME Section XI Figure IWC-2500-7. In addition, full coverage could not be achieved for the preservice (volumetric) ultrasonic method. Ultrasonic testing is the preferred examination method for both preservice and inservice examinations due to the inherent radiation problems associated with radiographic examinations. The proposed alternative examination coverage will ensure an acceptable level of quality and safety. Modifying the plant to allow 100% ultrasonic examination coverage, or requiring radiography as the preservice examination method, would result in a substantial burden without a corresponding increase in quality or safety.

One administrative correction is noted herein for Relief Request SR-14. The item number of ASME Section XI, Table IWC-2500-1, examination category C-F-1, provided in the initial submittal as the impracticable Code requirement was C5.11. This item number should be C5.21.

NRC Question No. 2

For Requests for Relief SR-15, SR-16, and SR-17, you have presented coverages obtained from actual examinations and estimated coverages for the remaining

scheduled portion of the subject welds. It should be noted that relief requests should present coverages obtained/obtainable, based on actual examinations. Typically, licensees submit requests for relief following completion of the entire weld. Provide a basis for submitting the request for relief prior to the completion of the examinations.

Virginia Power Response

It is our understanding that for Code required examinations where we know in advance that full examination coverage will not be possible, a relief request should be submitted in advance. Since we have previously examined portions of the welds addressed by these relief requests, we are aware of the examination coverage restrictions. Consequently, we recognize that relief from the ASME Section XI examination requirements for these welds will be required in the second and third period of the third inspection interval. Therefore, we believe it is prudent to request relief prior to the next scheduled examinations of these welds. This is consistent with several relief requests we have previously submitted for the Surry Unit 2 Interval Three (3) Program and approved by the NRC in your letter dated August 30, 1995 (Serial No. 95-480).