

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 31, 1997

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20005

Serial No. 97-640
NL&OS/GDM R1
Docket No. 50-280
License No. DPR-32

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
RISK-INFORMED INSERVICE INSPECTION PILOT PROGRAM

In a letter dated April 8, 1996 (Serial No. 96-158), Virginia Electric and Power Company informed Dr. Brian W. Sheron of the NRC that we were willing to have Surry Unit 1 participate as the pilot plant application for a Risk-Informed Inservice Inspection (RI-ISI) Program. The RI-ISI Program is described in the Westinghouse Owners Group Topical Report WCAP-14572, Revision 1, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report." Enclosure 1 provides a listing of reference documents of meeting minutes and summaries associated with the development of the RI-ISI Program. Meeting participants included personnel from the NRC, Virginia Electric and Power Company, Westinghouse Owners Group and other industry representatives. These meetings facilitated: 1) the review of the process used to develop our Risk-Informed Inservice Inspection Program, and 2) the provision of supporting technical information leading to our program submittal.

The Risk-Informed Inservice Inspection Program is an alternative to current ASME Section XI inspection requirements for piping. The enclosed documents support the conclusion that the proposed alternative provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i). This program submittal has been reviewed and approved by the Station Nuclear Safety and Operating Committee. Therefore, pursuant to 10 CFR 50.55a(a)(3), the proposed Risk-Informed Inservice Inspection Program for Surry Unit 1 (Enclosure 2) is provided for your review and approval as an alternative to current ASME Section XI inspection requirements for piping.

It is requested that NRC approval be provided to support implementation of the Risk-Informed Inservice Inspection Program during the next planned refueling outage for Surry Unit 1 currently scheduled for October 1998. Mr. Thomas V. Greene of the Westinghouse Owners Group requested an approval date of April 1998 for the use of

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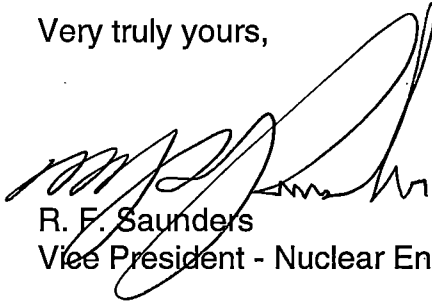


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the Risk-Informed Inservice Inspection Program at Surry in his letter to Dr. Sheron dated September 24, 1997. This approval date would permit implementation of the program in time to support the October 1998 Unit 1 refueling outage. It should also be noted that we consider implementation of the Risk-Informed Inservice Inspection Program to be a Cost Beneficial Licensing Action.

If you have any questions or require additional information, please contact us.

Very truly yours,



FOR

R. F. Saunders
Vice President - Nuclear Engineering and Services

Enclosure 1 - Meeting Minutes List
Enclosure 2 - Risk-Informed Inservice Inspection Program Submittal for Surry Power Station Unit 1

cc: U. S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, Georgia 30303

Mr. R. A. Musser
NRC Senior Resident Inspector
Surry Power Station

Commitment Summary

1. The commitment made in this letter is to implement the Risk-Informed Inservice Inspection Program as detailed in this submittal.

Enclosure 1

**Reference Documents of Meeting Minutes and Summaries Associated with the
Development of the Risk-Informed Inservice Inspection Program**

Enclosure 1
Reference Documents of Meeting Minutes and Summaries

- ASME Research meeting minutes for April 3-4, 1996, Surry Verification & Validation (V&V) ASME/WOG methodology kick-off and training meeting at Virginia Power Innsbrook facility.
- ASME Research meeting minutes for May 14-15, 1996, Surry V&V at Galt House Hotel, Louisville, KY.
- ASME Research meeting minutes, "LWR Components Working Group, ASME Research Task Force on Risk-Based Inspection," dated July 15, 1996.
- Letter from NRC Syed Ali to Goutam Bagchi NRC, "Surry Power Station Unit 1 Piping Structural Reliability Evaluation Meeting on July 31, 1996," dated August 2, 1996
- Letter from NRC to file, " Meeting Summary - ASME Research meeting on risk-based ISI: Surry Risk-based ISI program," August 6-7, 1996
- Letter from NRC to file, " Summary of meeting with NEI on RI-ISI Programs, Sept. 20, 1996."
- Letter from NRC to file, "Meeting Summary - Meeting with ASME Research on Nuclear Risk-Based Inservice Inspection Programs," (November 7-8, 1996), dated December 10, 1996.
- Letter from NRC to file, "Meeting Summary - ASME Research Meeting on Risk-Informed ISI: Statistical Sampling Method of Welds," dated January 8, 1997.
- Letter from NRC to file, "Meeting Summary - ASME Research Meeting on Risk-Informed ISI: Pilot Plant Preliminary Results," dated February 25, 1997.
- Letter from NRC to file, "Summary of meeting with NEI on RI-ISI," April 15, 1997
- Letter from NRC to file, "Meeting Summary - Meeting at Virginia Power's Innsbrook Facility Near Richmond, Virginia, on Risk-Informed Inservice Inspection," dated May 30, 1997
- Letter from NRC to file, "Meeting Summary - Meeting at Virginia Power's Surry Nuclear Power Plant on Risk-Informed Inservice Inspection Program," dated September 18, 1997.
- Letter from NRC to file, "Meeting Summary - Public Meeting on Risk-Informed Inservice Inspection: Surry Expert Panel Meeting," dated September 24, 1997.

Enclosure 2

**Risk-Informed Inservice Inspection Pilot Program Submittal
Surry Power Station Unit 1**