

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 22, 1997

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

Serial No. 97-264
NL&OS/ETS R1
Docket Nos. 50-280, 281
50-338, 339
License Nos. DPR-32, 37
NPF-4, 7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
ASME SECTION XI RELIEF REQUESTS

Surry Power Station Units 1 and 2 are presently in the third ten year inservice inspection interval and examinations are conducted to the requirements of the 1989 Edition of ASME Section XI. North Anna Power Station Units 1 and 2 are presently in the second ten year inservice inspection interval and examinations are conducted to the requirements of the 1983 and 1986 Editions of ASME Section XI, respectively. Pursuant to 10 CFR 50.55a(g), relief is requested from the requirements of the ASME Section XI Code for IWE and IWL repair and replacement activities for both Surry and North Anna from the effective date of Subsection IWE and Subsection IWL until September 9, 1997.

By Federal Register Notice 154 (Volume 61), dated August 8, 1996, the Nuclear Regulatory Commission amended its regulations to incorporate by reference the 1992 edition with 1992 addenda of Subsection IWE, and Subsection IWL, with specified modifications and a limitation in 10 CFR 50.55a. The effective date of the amended rule was September 9, 1996. The rule requires an expedited schedule for the completion of examinations, specifying that the first containment inspection (of the first interval) must be completed within five years from the effective date of the rule, that is, September 9, 2001. The rule does not provide time to develop procedures to implement the rules of Subsection IWE and Subsection IWL for repairs and replacements. Therefore, relief is being requested from the repair/replacement requirements of the Code until the appropriate implementing procedures can be developed.

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Relief requests for Surry Units 1 and 2 and North Anna Units 1 and 2 are provided in Attachments 1 and 2, respectively. These relief requests have been approved by the applicable Station Nuclear Safety and Operating Committee.

No new commitments are made as a result of this letter. If you have any questions concerning this request, please contact us.

Very truly yours,



R. F. Saunders
Vice President - Nuclear Engineering Services

Enclosure

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

NRC Senior Resident Inspector
North Anna Power Station

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

ATTACHMENT 1

ASME SECTION XI RELIEF REQUEST NO. IWE-1
SURRY POWER STATION UNITS 1 AND 2

Virginia Electric & Power Company
Surry Power Station Units 1 and 2
Third 10 Year Interval

Relief Request IWE-1

I. IDENTIFICATION OF COMPONENTS

All components subject to the rules and requirements for repair and replacement of Class MC pressure retaining components and their integral attachments, and of metallic shell and penetration liner of Class CC pressure retaining components and their integral attachments in light-water cooled plants as stated in the 1992 edition 1992 addenda of Subsection IWE, "Requirement for Class MC and Metallic Liners of Class CC Components of Light Water Cooled Plants," and IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Plants", of Section XI, Division 1, of the ASME Boiler and Pressure Vessel Code

II. CODE REQUIREMENTS

By Federal Register Notice 154 (Volume 61), dated August 8, 1996, the Nuclear Regulatory Commission amended its regulations to incorporate by reference the 1992 edition with 1992 addenda of Subsection IWE, and Subsection IWL, with specified modifications and a limitation in 10 CFR 50.55a. The effective date of the amended rule was September 9, 1996. The rule requires an expedited schedule to complete examinations, specifying that the first containment inspection (of the first interval) must be completed within five years from the effective date of the rule, that is, September 9, 2001. The rule does not provide time to develop procedures to implement the rules of Subsection IWE and Subsection IWL for repairs and replacements.

III. CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED

Relief is requested from the rules of Articles IWE-4000, "Repair Procedures", and IWE-7000 "Replacements", IWL-4000 "Repair Procedures", IWL-7000 "Replacements", for a period of one year from the effective date of Subsection IWE and Subsection IWL, September 9, 1997.

IV. BASIS FOR RELIEF

In order to meet the repair and replacement requirements of Subsection IWE and Subsection IWL, procedures will have to be developed. These new procedures will take time to develop and implement.

Repair and replacement activities are currently being performed in a controlled process under work orders and maintenance procedures. Materials and work practices are controlled under Virginia Electric and Power Company's Quality

Assurance Program. The work order process specifies post maintenance testing to assure the component will perform its design function.

V. ALTERNATE PROVISIONS

It is proposed that repair and replacement of items within the scope of Subsection IWE and Subsection IWL be controlled by maintenance and work order procedures. These procedures will be used until procedures are developed to satisfy the requirements of Subsection IWE and Subsection IWL. The new procedures will be developed and implemented by September 9, 1997.

The proposed alternative stated above will ensure that the overall level of plant quality and safety will not be compromised.

VI. IMPLEMENTATION SCHEDULE

This relief request will be implemented upon receiving NRC approval and will expire on September 9, 1997.

ATTACHMENT 2

ASME SECTION XI RELIEF REQUEST NO. IWE-1
NORTH ANNA POWER STATION UNITS 1 AND 2

Virginia Electric & Power Company
North Anna Power Station Units 1 and 2
Second 10 Year Interval

Relief Request IWE-1

I. IDENTIFICATION OF COMPONENTS

All components subject to the rules and requirements for repair and replacement of Class MC pressure retaining components and their integral attachments, and of metallic shell and penetration liner of Class CC pressure retaining components and their integral attachments in light-water cooled plants as stated in the 1992 edition 1992 addenda of Subsection IWE, "Requirement for Class MC and Metallic Liners of Class CC Components of Light Water Cooled Plants," and IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Plants", of Section XI, Division 1, of the ASME Boiler and Pressure Vessel Code

II. CODE REQUIREMENTS

By Federal Register Notice 154 (Volume 61), dated August 8, 1996, the Nuclear Regulatory Commission amended its regulations to incorporate by reference the 1992 edition with 1992 addenda of Subsection IWE, and Subsection IWL, with specified modifications and a limitation in 10 CFR 50.55a. The effective date of the amended rule was September 9, 1996. The rule requires for an expedited schedule to complete examinations, specifying that the first containment inspection (of the first interval) must be completed within five years from the effective date of the rule, that is, September 9, 2001. The rule does not provide time to develop procedures to implement the rules of Subsection IWE and Subsection IWL for repairs and replacements.

III. CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED

Relief is requested from the rules of Articles IWE-4000, "Repair Procedures", and IWE-7000 "Replacements", IWL-4000 "Repair Procedures", IWL-7000 "Replacements", for a period of one year from the effective date of Subsection IWE and Subsection IWL, September 9, 1997.

IV. BASIS FOR RELIEF

In order to meet the repair and replacement requirements of Subsection IWE and Subsection IWL, procedures will have to be developed. These new procedures will take time to develop and implement.

Repair and replacement activities are currently being performed in a controlled process under work orders and maintenance procedures. Materials and work practices are controlled under Virginia Electric and Power Company's Quality

Assurance Program. The work order process specifies post maintenance testing to assure the component will perform its design function.

V. ALTERNATE PROVISIONS

It is proposed that repair and replacement of items within the scope of Subsection IWE and Subsection IWL be controlled by maintenance and work order procedures. These procedures will be used until procedures are developed to satisfy the requirements of Subsection IWE and Subsection IWL. The new procedures will be developed and implemented by September 9, 1997.

The proposed alternative stated above will ensure that the overall level of plant quality and safety will not be compromised.

VI. IMPLEMENTATION SCHEDULE

This relief request will be implemented upon receiving NRC approval and will expire on September 9, 1997.