

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 22, 1997

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

Serial No. 97-526
NL&OS/GDM R0'
Docket No. 50-280
License No. DPR-32

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
ASME SECTION XI INSERVICE INSPECTION PROGRAM RELIEF REQUEST

During the Spring 1997 refueling outage, Surry Power Station Unit 1 completed examinations in the second period of the third ten year interval. Examinations were conducted to the requirements of the 1989 Edition of ASME Section XI. However, there were instances where the examination coverage required by the Code was not possible due to obstructions. Therefore, pursuant to 10 CFR 50.55a(g)(5), relief is requested from certain requirements of the ASME Section XI Code associated with partial examinations conducted during the 1997 Surry Unit 1 refueling outage. Relief request SR-019 is attached and provides the basis of this request.

This relief request has been approved by the Station Nuclear Safety and Operating Committee.

If you have any additional questions concerning this request, please contact us.

Very truly yours,



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

Attachment

Commitments made in this letter: None

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

ATTACHMENT

ASME SECTION XI RELIEF REQUEST NO. SR-019

SURRY POWER STATION UNIT 1

Virginia Electric & Power Company
Surry Power Station Unit 1
Third Ten Year Interval

Request for Relief No. SR-019

I. Identification of Component:

<u>Weld No.</u>	<u>Component</u>	<u>Drawing No.</u>	<u>Class</u>
Weld H002-1	1-RH-E-1A	11448-WMKS-RH-E-1A (attached)	2
Weld H001-1	1-RH-E-1B	11448-WMKS-RH-E-1B (attached)	2

The above welds are integrally welded attachments on the residual heat removal heat exchangers 1-RH-E-1A and 1-RH-E-1B.

II. Code Requirements:

The 1989 Edition of ASME Section XI Table IWC-2500-1, examination category C-C, item number C3.10 requires a surface examination of the weld and adjacent base metal as defined by Figure IWC-2500-5. The Code does not allow any limitations to the required surface examinations. Code Case N-460, Alternative Examination Coverage for Class 1 and Class 2 Welds, allows a reduction in coverage, if it is less than 10 percent.

III. Code Requirement from which Relief is Requested:

Relief is requested from fully performing the Code-required (1989 Edition of ASME Section XI Table IWC-2500-1, examination category C-C, item number C3.10) surface examination on the above identified integrally welded attachments on the residual heat removal heat exchangers 1-RH-E-1A and 1-RH-E-1B.

IV. Basis for Relief:

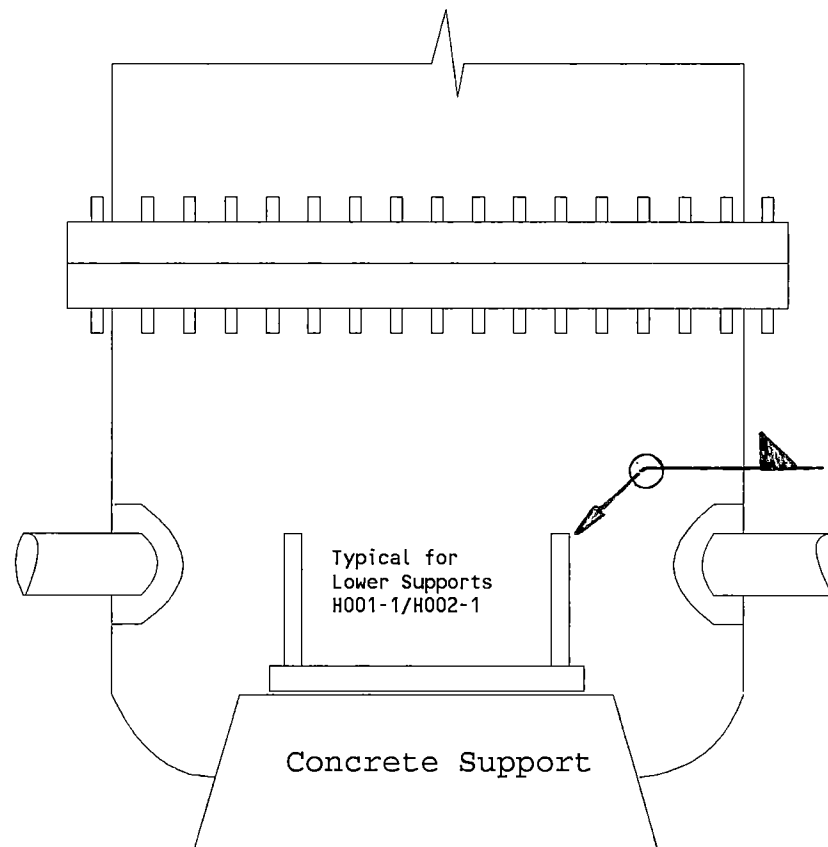
The components listed above have been examined to the extent practical as required by the Code. Approximately seventy-four (74) percent of the required examination was completed. Therefore, the reduction in coverage is approximately twenty-six (26) percent. Full surface coverage could not be

achieved due to interferences from the concrete support. The integrally welded attachments on the residual heat removal heat exchangers 1-RH-E-1A and 1-RH-E-1B rest on the concrete support, which precludes accessibility to the whole bottom of the integrally welded attachment. Figure SR-019-1 (attached) provides a graphic detail of the limitation experienced. Substitution with another weld is not feasible because the "A" and "B" heat exchangers both have the same limitation due to design. Redesign of the support structure would be impractical and cause a hardship without a compensating increase in quality and safety. The design of the integrally welded attachments is such that if failure of the inaccessible lower weld were to occur a failure of the accessible welds would also occur. Therefore, failure of the inaccessible portion of the weld would lend itself to detectability in the accessible welds.

V. Proposed Alternate Examination:

It is proposed that the examination already completed at the reduced coverage be considered as satisfying the Code requirements. The proposed alternative examination will ensure that the overall level of plant quality and safety will not be compromised.

Figure SR-019-1



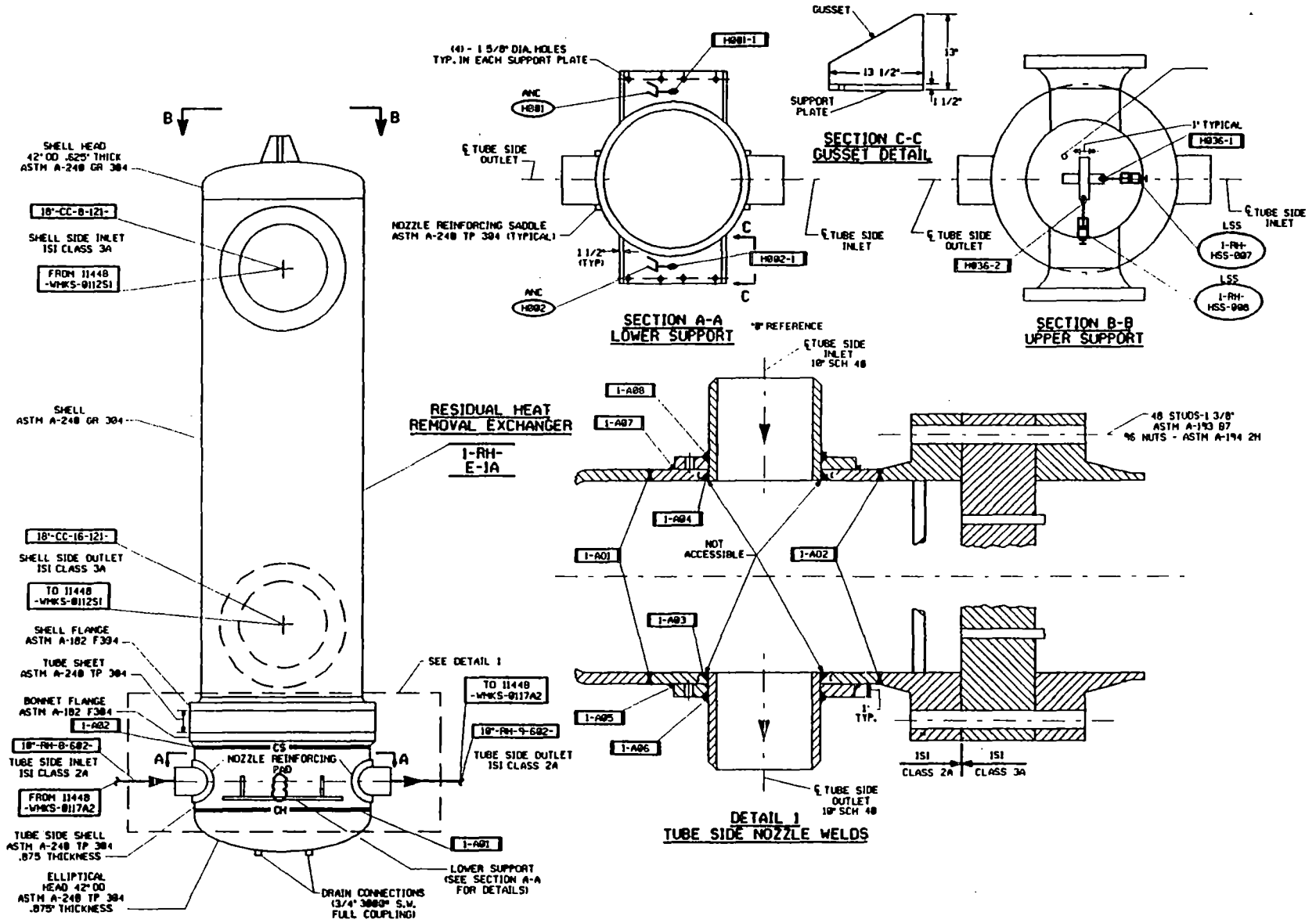
Typical for
Lower Supports
H001-1/H002-1

Concrete Support

Note: The weld completely surrounds the support, i.e., both vertical members and horizontal member. The bottom weld is inaccessible.

This drawing shows the bottom support arrangements for 1-RH-E-1A and 1-RH-E-1B

11448-WMKS-RH-E-1A



11448-WMKS-RH-E-1B

