VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

February 3, 1997

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. 97-077 NL&OS/GDM R0 Docket Nos. 50-280 50-281 License Nos. DPR-32 DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY SURRY POWER STATION UNITS 1 AND 2 PROPOSED TECHNICAL SPECIFICATIONS CHANGE DELETION OF SPECIFIC ASME SECTION XI CODE REFERENCE

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company requests amendments, in the form of changes to the Technical Specifications, to Facility Operating License Numbers DPR-32 and 37 for Surry Power Station Units 1 and 2. Consistent with the requirements of 10 CFR 50.55a(g)(5)(ii), the proposed change will delete a specific reference to the 1972 Winter Addenda of the ASME Section XI Code in the Technical Specifications and replace it with a generic reference to the ASME Section XI Code for Class 2 welds (IWC).

A discussion of the proposed Technical Specifications change is provided in Attachment 1. The proposed Technical Specifications change is provided in Attachment 2. It has been determined that the proposed Technical Specifications change does not involve an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92. The basis for our determination that the changes do not involve a significant hazards consideration is provided in Attachment 3. The proposed Technical Specifications change has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee.

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

Very truly yours,

Hanton fames,

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James P. O'Hanlon Senior Vice President - Nuclear

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Attachments

U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, N.W. Suite 2900 Atlanta, Georgia 30323

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

Commissioner Department of Radiological Health Room 104A 1500 East Main Street Richmond, VA 23219

cc:

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COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. P. O'Hanlon, who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

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Acknowledged before me this 3^{rd} day of 4rbuau, 1997.

My Commission Expires: March 31, 2000.

Notary Public



ATTACHMENT 1

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DISCUSSION OF CHANGE

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SURRY POWER STATION UNITS 1 AND 2

VIRGINIA ELECTRIC AND POWER COMPANY

INTRODUCTION

Paragraph 50.55a(g)(5)(ii) in 10 CFR 50 states that, "If a revised inservice inspection program for a facility conflicts with the technical specification for the facility, the licensee shall apply to the Commission for amendment of the technical specifications to conform the technical specification to the revised program. The licensee shall submit this application, as specified in Section 50.4, at least six months before the start of the period during which the provisions become applicable, as determined by paragraph (g)(4) of this section." Surry Power Station Units 1 and 2 Technical Specification 4.15, "Augmented Inservice Inspection Program for High Energy Lines Outside of Containment," references an edition of the ASME Section XI Code (hereto after referred to as the Code) that conflicts with the edition that is NRC approved and currently applicable for the station's Inservice Inspection (ISI)_Program. Consequently, a change to Technical Specification 4.15 is proposed to resolve the difference between Code edition references.

To eliminate this inconsistency between the current approved ISI Program and Code (1989 Edition) and the Technical Specifications, Virginia Electric and Power Company is proposing to eliminate the reference to a specific Code edition in the Technical Specifications. The proposed Technical Specifications change does not detrimentally affect the augmented inservice inspection program currently conducted on high energy main steam and feedwater piping located in the main steam valve house as described in Technical Specifications Section 4.15. This augmented inspection program was imposed by the NRC Staff to address the issues associated with design adequacy of certain safety-related components needed for safe shutdown which could be adversely impacted by a postulated high energy pipe break. The proposed change to Technical Specification 4.15.B.1 is administrative in nature in that it includes a general reference to the ASME Section XI Code rather than a specific reference. This change provides uniformity within the Inservice Inspection Program, which includes our augmented inspection program, by ensuring that all weld inspections are performed to the current NRC-approved version of the ASME Section XI Code approved for use at Surry Power Station. This change is also consistent with the wording of Technical Specifications 4.15.A and C which invoke ASME Section XI requirements in a more general fashion.

The proposed change ensures the type of examination, extent of examination and frequency of examination on the affected components will be conducted consistent with the current NRC-approved version of the ASME Section XI Code as required by 10 CFR 50.55a. The proposed change does not alter any break analysis provided in the UFSAR for high energy line breaks. The proposed change is administrative in nature and ensures consistency within the ISI program, which includes the augmented inspection program. Consequently, the proposed change does not pose a significant safety hazard, nor does it represent an unreviewed safety question.

BACKGROUND

Paragraph 4.15.B.1 states that, "Welds in the main steam lines and in the feedwater lines in the main steam valve house shall be examined in accordance with the requirements of subsection ISC 100 through 600 of the 1972 Winter Addenda of ASME Section XI Code." These examinations are considered augmented examinations in the Surry Units 1 and 2 Inservice Inspection (ISI) Program and are described in the third ten-year interval ISI Program Plans submitted to the NRC.

Surry Power Station has received NRC safety evaluations for ISI Program Plans, Unit 1 and Unit 2. The technical evaluation that is included with the NRC safety evaluation describes the augmented examination commitments in Section 2.2.4. As part of these commitments, paragraph (c) states for Unit 1 that we committed to the, "Examination of the portions of the high energy lines specified in Technical Specification 4.15. For Surry, Unit 1, this specification applies to welds in the Main Steam and Main Feedwater lines in the Main Steam Valve House;" The technical evaluation for Unit 2 has the same reference.

Therefore, as described in the third ten year interval ISI program plans for Surry Units 1 and 2, and as approved by the NRC, the proper Code edition for the welds described in Technical Specification 4.15.B.1 is the 1989 Edition of ASME Section XI. As required by 10 CFR 50.55a(g)(5)(ii), paragraph 4.15.B.1 should have been amended to conform to the revised ISI program to ensure consistency. The proposed change to Technical Specification 4.15.B.1 provides a general reference to the ASME Section XI Code without specific reference to a Code edition. The use of a general Code reference is consistent with the wording in Technical Specifications 4.15.A and C, and ensures that weld examinations are being consistently performed to the currently approved edition of the ASME Section XI Code approved for use at Surry Power Station.

LICENSING BASIS

In a December 18, 1972 letter to Virginia Electric and Power Company, the NRC staff required the performance of an analysis and the associated documentation of the consequences of postulated pipe failures outside the containment structure, including the rupture of a main steam or feedwater line. On June 22, 1973 (Serial No. 01973), Virginia Electric and Power Company provided the NRC with the results of an analysis of the consequences of postulated pipe failures outside the containment structure, including the rupture of a main steam or feedwater line. Subsequent to this submittal, several telephone conversations between the AEC and Virginia Electric and Power Company transpired regarding the specifics of the evaluation and our commitment to perform an augmented inspection program. In our letter dated July 16, 1973 (Serial No. 03873), we discussed the details of a non-destructive testing program for the twenty major stress points for each unit's high energy pipe in the Main Steam Valve House and noted that the stress points would be examined in accordance with ASME Section XI requirements. We further documented two additional NRC comments and our corresponding responses in our letter dated July 27, 1973 (Serial No. 05473). In that letter, the NRC required the

examination of all other welds in the Main Steam Valve House in accordance with ASME Section XI requirements. We specified that the examination of the other welds in the main steam and feedwater lines would be performed in accordance with Paragraph ISC-242 of the Winter 1972 Addenda of the ASME Section XI Code. This specific reference to a Code edition likely occurred because it was the first edition to include examination requirements for Class 2 pipe.

The NRC specified a change to the Surry Technical Specifications on September 21, 1973 that approved our augmented inspection program. In this Technical Specifications change, the NRC expanded the previous reference to examine other welds in the main steam and feedwater lines in the Main Steam Valve House in accordance with Paragraph ISC-242 of the Winter 1972 Addenda of the ASME Section XI Code noted above. The NRC issued Technical Specification 4.15 with the following, more specific wording for the ASME Section XI Code requirements for weld examinations in 4.15.B.1:

"1. Welds in the main steam lines including the safety valve headers and in the feedwater lines in the main steam valve house shall be examined in accordance with the requirements of subsection ISC 100 through 600 of the 1972 Winter Addenda of the ASME Section XI Code."

Again, we believe this specific reference to the ISC subsections of the 1972 Winter Addenda was because that Code edition was the first to include examination requirements for Class 2 pipe and these requirements were to be applied to the non-code pipe in the augmented inspection program. Paragraphs 4.15.A and 4.15.C included only general references to the ASME Section XI Code.

Since original incorporation into the Technical Specifications, we have submitted ISI Programs for the second and third ten-year inspection intervals to the NRC for their approval. These submittals updated our ASME Section XI Code of record to the 1980 edition and the 1989 edition, respectively. Surry Power Station last received NRC safety evaluations for our third ten-year interval ISI Program Plans for Unit 1 and Unit 2 in the Staff's letters dated July 19, 1995 and August 30, 1995, respectively. The technical evaluations that are included with the NRC safety evaluations describe the augmented examination commitments in Section 2.2.4. As part of these commitments, paragraph (c) states for Unit 1 that we have committed to the "Examination of the portions of the high energy lines specified in Technical Specification 4.15. For Surry, Unit 1, this specification applies to welds in the Main Steam and Main Feedwater lines in the Main Steam Valve House;" The technical evaluation for Unit 2 has the same reference.

Therefore, as described in the third ten-year interval ISI program plans for Surry Units 1 and 2, and as confirmed by the NRC safety evaluations, the proper Code edition for the welds described in Technical Specification 4.15.B.1 is the 1989 Edition of ASME Section XI. As required by 10 CFR 50.55a(g)(5)(ii), paragraph 4.15.B.1 requires revision to be consistent with the revised ISI program.

CURRENT DESIGN BASIS

The current requirements for high energy line breaks are based upon Criterion No. 4 of the Commission's General Design Criteria, listed in Appendix A of 10 CFR Part 50 which requires that,

"Structures, systems, and components important to safety shall be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing and postulated accidents, including loss-of-coolant accidents. These structures, systems and components shall be appropriately protected against dynamic effects, including the effects of missiles, pipe whipping, and discharging fluids, that may result from _equipment failures and from events and conditions outside the nuclear power unit."

Virginia Electric and Power Company's analysis of the consequences of postulated pipe failures outside the containment structure, including the rupture of a main steam or feedwater line was submitted to the NRC in our letter dated June 22, 1973 (Serial No. 01973). This analysis has been incorporated into the Surry UFSAR as Appendix 14B. As a result, an augmented inspection program was placed in Surry Technical Specifications Section 4.15.

DISCUSSION OF CHANGE

The proposed change will eliminate any specific reference to a Code edition and addenda in Technical Specification 4.15.B.1 by generically referencing the periodically updated Code edition used for the ASME Section XI program. This change would eliminate the inconsistency between Code editions. The proposed change is administrative in nature. Technical issues concerning the Code were resolved previously through the NRC endorsement process which updates 10 CFR 50.55a(b)(2). The integrity of the pipe examined by the augmented inspection program will be assured through the use of the current NRC and industry approved version of the ASME Section XI approved for use at Surry Power Station.

SPECIFIC CHANGES

Surry Technical Specification 4.15.B.1 is revised to delete the specific reference to Subsection ISC 100 through 600 of the 1972 Winter Addenda of the ASME Section XI Code. The specific reference is replaced with a general reference to the ASME Section XI Code, Subsection IWC, without specific reference to Code edition.

SAFETY SIGNIFICANCE

The proposed change administratively updates the Code reference to a generic, periodically updated reference to ASME Section XI as approved for use at Surry Power

Station. Examinations will continue on the applicable piping using an approved NRC and industry recognized Code and will assure piping integrity. The administrative change to Technical Specification 4.15.B.1 has no impact on safety and therefore does not result in an unreviewed safety question.

ATTACHMENT 2

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PROPOSED TECHNICAL SPECIFICATIONS CHANGE

SURRY POWER STATION UNITS 1 AND 2