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ACCESSION NBR: 9505190381 DOC. DATE: 95/05/15 NOTARIZED: NO DOCKET # 05000281
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 AUTH. NAME: O'HANLON, J.P. AUTHOR AFFILIATION: Virginia Power (Virginia Electric & Power Co.)
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SUBJECT: Submits response to ISI program clarification of ASME relief request.

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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 15, 1995

United States Nuclear Regulatory Commission
Attention: Document Control Desk
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Serial No. 95-145
NL&P/ETSR2'
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Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 2
INSERVICE INSPECTION PROGRAM
CLARIFICATION OF ASME RELIEF REQUEST RESPONSE

On March 8, 1995, interim relief from selected ASME Section XI requirements was granted for Surry Power Station Unit 2. Qualifications pertaining to Relief Request RR-6 were stated in this letter. Relief Request RR-6 detailed Virginia Electric and Power Company's request for relief from Subparagraph IWA-5242(a) of the 1989 Edition of the ASME Section XI Code. For systems borted for the purpose of controlling reactivity, this subparagraph requires the removal of insulation from pressure-retaining bolted connections for the performance of visual examination (VT-2). These examinations are intended to be conducted in conjunction with system leakage tests which are performed at normal operating temperature and pressure prior to plant startup.

Based upon a statement pertaining to RR-6 included in the NRC letter referenced above, clarification is appropriate. The discussion in the letter regarding RR-6 states: "This interim relief is being granted for the Unit 2 refueling outage, which commenced February 1995, with the understanding that modification of the insulation on selected areas will be performed to make this relief request unnecessary for any future Unit 2 refueling outages." This statement does not represent our intentions with regard to RR-6 and indicates that an apparent misunderstanding of our intentions exists.

On February 22, 1995, Virginia Electric and Power Company personnel discussed the basis for RR-6 with the NRC Staff. RR-6 was submitted to address plant-specific conditions which make compliance with selected ASME Section XI requirements impractical. Because Surry operates with subatmospheric containments, compliance with these Section XI Class 1 and Class 2 inspection requirements would require station personnel to reinsulate the lines as well as disassemble and remove scaffolding from within containment while wearing self-contained breathing apparatus. Furthermore, the piping will be at normal operating temperature which will create an additional personnel hazard. Personnel will also be exposed to increased radiation levels.

Virginia Electric and Power Company's RR-6 seeks permanent relief from the selected ASME Section XI requirements. The containment and plant operating conditions

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under which the required inspection would be performed at Surry Unit 2 will not change over the inspection interval for which relief is requested.

During RR-6 discussions, the NRC Staff requested that we consider removing insulation and inspecting Class 2 as well as Class 1 sections of the piping on a refueling rather than ten year interval basis. This request would increase the inspection frequency for Class 2 sections of piping specified in RR-6.

We responded that this request would not be a problem for future refueling outages. However, due to the timing of the request, the additional inspection scope would present problems for the then ongoing Surry Unit 2 refueling outage. Specifically, the additional inspection scope associated with including Class 2 pipe sections had not been identified for performance during the Unit 2 outage. The increased inspections could not have been added to the outage without impacting the overall outage schedule.

The discussions concluded with our commitment to remove insulation and subsequently perform the alternate examinations proposed in RR-6 for applicable Class 2 pipe segments on a refueling basis starting with the next refueling outage as proposed in RR-6. This commitment is only applicable to piping systems addressed in RR-6.

In summary, permanent approval of RR-6 is requested to reduce potential risks to personnel. Implementation of the alternatives proposed in RR-6 does not require the permanent modification of any insulation. RR-6 is necessary not only during the approved interim period but also throughout the remaining third ten year inservice inspection interval.

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

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

cc: United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Suite 2900
Atlanta, GA 30323

Mr. Morris Branch
NRC Senior Resident Inspector
Surry Power Station