VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 22, 1994

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

Serial No. 94-320
SPS/ETS
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
INSERVICE INSPECTION PROGRAM
ASME CODE CASE N-416-1

ASME Code Case N-416-1 (attached), "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2, and 3 Section XI, Division 1," was approved by the ASME Code on February 15, 1994. However, this Code Case has not yet been endorsed in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1," due to its recent approval by ASME. Therefore, pursuant to 10 CFR 50.55a(a)(3), it is requested that Code Case N-416-1 be approved for use during the Surry Units 1 and 2 third 10-year intervals in lieu of the previously submitted relief request.

By letter dated July 16, 1993 (Serial No. 93-420), Relief Request 9 of the third interval ISI Program for Surry Unit 1 was submitted to the NRC for approval. This request addresses post weld repair and replacement testing requirements, which are similar to the requirements delineated in Code Case N-416-1. Since the ASME Code now addresses post weld repair and replacement hydrostatic testing requirements through Code Case N-416-1, Relief Request 9 of the Unit 1 ISI Program is no longer necessary and is hereby withdrawn.

In past situations we have found it necessary to defer hydrostatic tests or ask relief from post ASME Section XI hydrostatic tests following repair or replacement activities. This was due to various reasons of impracticality in testing, ranging from boundary valve isolation problems to incorporation of the steam generators within the hydrostatic test boundary. These situations are typically unexpected and are usually only identified during the actual inservice inspection. As a consequence, some of these situations have necessitated immediate communication with the NRC to avoid exceeding limiting conditions of operation or startup delays.

Use of hydrostatic test deferrals, which are presently allowed in the current Code Case N-416 for Class 2 components, are not a satisfactory solution because the test must eventually be performed, and it is the performance of the test itself that is considered

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burdensome. Deferred hydrostatic testing requirements should be assessed considering that the 10-year hydrostatic test is no longer required with the NRC endorsement of Code Case N-498, Alternative Rules for 10-year Hydrostatic Pressure Testing for Class 1 and 2 Systems Section XI, Division 1.

Code Case N-416-1 provides increased testing flexibility to the Owner, which should considerably reduce, if not eliminate, relief request requirements associated with post welded repair/replacement hydrostatic testing. This is accomplished while maintaining an acceptable level of safety and quality as determined by the ASME Code.

Unit 2 is currently scheduled to start its refueling outage in January of 1995. The Unit 1 refueling outage is currently scheduled to start in September of 1995. If permanent approval for use of Code Case N-416-1 cannot be obtained in the time period remaining prior to the refueling outages, it is requested that Surry be granted interim approval to use Code Case N-416-1 for the next refueling outages.

If you have any questions, please contact us.

Very truly yours,

James P. O'Hanlon

James P. O'Hanlon
Senior Vice President - Nuclear

Attachment

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

Mr. Morris Branch
NRC Senior Resident Inspector
Surry Power Station

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: February 15, 1994

See Numeric Index for expiration and any reaffirmation dates

Case N-416-1
Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2 and 3 Section XI, Division 1

Inquiry: What alternative pressure test may be performed in lieu of the hydrostatic pressure test required by para. IWA4000 for welded repairs or installation of replacement items by welding?

Reply: It is the opinion of the Committee that in lieu of performing the hydrostatic pressure test required by para. IWA-4000 for welded repairs or installation of replacement items by welding, system leakage test may be used provided the following requirements are met.

(a) NDE shall be performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of Section III.

(b) Prior to or immediately upon return to service, a visual examination (VT-2) shall be performed in conjunction with a system leakage test, using the 1992 Edition of Section XI, in accordance with para. IWA-5000 at nominal operating pressure and temperature.

(c) Use of this Case shall be documented on an NIS-2 Form.

If the previous version of this case were used to defer a Class 2 hydrostatic test, the deferred test may be eliminated when the requirements of this revision are met.