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SUBJECT: Forwards draft ASME Code Case N-498-1, "Alternative Rules for 10-Yr Sys Hydrostatic Testing for Class 1, 2 & 3 Sys Section XI, Div 1" for approval for use at Surry Unit 2 to complete second interval requirements.

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VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

July 12, 1994

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

Serial No. 94-392  
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Docket No. 50-281  
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Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNIT NO. 2**  
**INSERVICE INSPECTION PROGRAM**  
**ASME CODE CASE N-498-1**

ASME Code Case N-498-1 (attached draft ASME copy), "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems Section XI, Division 1," was approved by ASME on May 11, 1994. This Code Case has not been approved for use by 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-498-1 be approved for use at Surry Unit 2 to complete its second interval requirements.

Surry Unit 2 is scheduled to complete its second interval, 10-year inservice inspections during its next refueling outage, which is currently scheduled to begin January 14, 1995. Code Case N-498-1 now provides an alternative to the Class 3, as well as the Class 1 and 2 (N-498) hydrostatic test Code requirements (ASME Section XI 1980 Edition, Winter 1980 addenda). Planning requirements associated with this outage requires that advance approval for use of Code Case N-498-1 be obtained in lieu of the normal Regulatory Guide 1.147 revision process.

Hydrostatic tests are historically difficult to perform, frequently requiring extended test duration, while non-safety related issues such as maintenance boundary valve isolation problems are resolved. This adversely affects exposure accumulated by test personnel and system tag-out duration. Code Case N-498-1 provides increased testing flexibility, allowing testing to be performed at nominal operating pressure, therefore, significantly reducing the number of test blocks, system tag-outs, and corresponding boundary valves required to complete testing. This flexibility is accomplished while maintaining an acceptable level of safety and quality as determined by the ASME Code consensus process.

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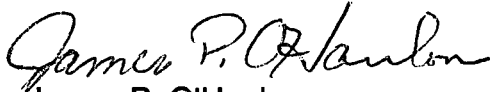
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Code Case N-498-1 will continue to provide assurance of component structural integrity as intended by the ASME Code and , as such, it is requested that interim use of the Code Case be approved for the upcoming Surry Unit 2 outage. .

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

Very truly yours,



James P. O'Hanlon  
Senior Vice President - Nuclear

Attachment

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

Mr. M. W. Branch  
NRC Senior Resident Inspector  
Surry Power Station

**Attachment**

**ASME Draft Code Case N-498-1**

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**N-498-1**

Approval Date: May 11, 1994

See Numerical Index for expiration  
and any reaffirmation dates.

**Case N-498-1**  
**Alternative Rules for 10-Year System Hydrostatic**  
**Testing for Class 1, 2 and 3 Systems**  
**Section XI, Division 1**

*Inquiry:* What alternative rules may be used in lieu of those required by Section XI, Division 1, Table IWB-2500-1, Category B-P, Table IWC-2500-1, Category C-H, and Table IWD-2500-1, Categories D-A, D-B, and D-C, as applicable, for the 10-year system hydrostatic test?

*Reply:*

(a) It is the opinion of the Committee that as an alternative to the 10-year system hydrostatic test required by Table IWB-2500-1, Category B-P, the following rules shall be used.

(1) A system leakage test (IWB-5221) shall be conducted at or near the end of each inspection interval, prior to reactor startup.

(2) The boundary subject to test pressurization during the system leakage test shall extend to all Class 1 pressure retaining components within the system boundary.

(3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure for at least 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.

(4) Test temperatures and pressures shall not exceed limiting conditions for the hydrostatic test curve as contained in the plant Technical Specifications.

(5) The VT-2 visual examination shall include all components within the boundary identified in (a)(2) above.

(6) Test instrumentation requirements of IWA-5260 are not applicable.

(b) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWC-2500-1, Category C-H, the following rules shall be used.

(1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.

(2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 2 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve, including a safety or relief valve, or valve capable of automatic closure when the safety function is required.

(3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure for a minimum of 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.

(4) The VT-2 Visual Examination shall include all components within the boundary identified in (b)(2) above.

(5) Test instrumentation requirements of IWA-5260 are not applicable.

(c) It is the opinion of the Committee that, as an alternative to the 10-year system hydrostatic test required by Table IWD-2500-1 Categories D-A, D-B, or D-C (D-B for the 1989 Edition with the 1991 and subsequent Addenda), as applicable, the following rules shall be used.

(1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.

(2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 3 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve, including a safety or relief valve, or valve capable of automatic closure when the safety function is required.

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(3) Prior to performing the VT-2 visual examination, the system shall be pressurized to nominal operating pressure for at least 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during performance of the VT-2 visual examination.

(4) The VT-2 visual examination shall include all components within the boundary identified in (c)(2) above.

(5) Test instrumentation requirements of IWA-5260 are not applicable.

\*\*\* END \*\*\*