VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

October 8, 1993

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, D. C. 20555 Serial No. 93-451A NL&P/ETS 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 INSERVICE INSPECTION PROGRAM PRESSURIZER WELD EXAMINATIONS

Inservice Inspection Program relief requests SR-005 were submitted for Surry Power Station Units 1 and 2 on April 16, 1987 and supplemented on February 15, 1989. These requests identified a support structure obstruction which prevented complete examination of the shell-to-top head weld and intersecting longitudinal weld on the pressurizers (1-RC-E-2 and 2-RC-E-2). Specifically, relief was requested from the full volumetric examinations requirements of Section XI, 1980 Edition, Winter 1980 Addenda, Category B-B. As an alternative, we proposed to examine the welds to the extent practical, and delay removing the support structure to perform a complete examination of the identified welds until later in the second ten year interval. These requests were evaluated and approved by the staff in a SER dated March 14, 1991.

We reassessed the pressurizer welds and conclude that removal of the support structure from the pressurizer to perform a complete examination is not practical. Our evaluation estimated that the removal activities and examination of the obstructed portion of the welds will require an expenditure of 18.4 man-rem per unit to accomplish. Based on the large man-rem expenditure, we believe that a complete examination requiring support structure removal is not commensurate with the gain in assurance of component integrity. As such, on August 11, 1993, we requested withdrawal of the original relief requests, with the intention of completing the weld examinations to the extent practical for both units. In a subsequent telephone conversation with your staff to discuss the pressurizer weld examination coverage, it was determined that submitting revised relief requests for the examinations would be necessary. Accordingly, we have reassessed the extent of examination coverage for each weld using the applicable Code requirements, and are providing the details in revised relief requests (SR-005) for both Surry Unit 1 and Unit 2, included as Attachments 1 and 2 to this letter. This letter supersedes our August 11, 1993 request (Serial No. 93-451).

We propose to perform the remaining third period Category B-B examinations on the

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pressurizer without removing the support interferences during the 1994 refueling outages for both units. The Code required examination will be completed to the extent practical. If the examination coverage attained for these welds is significantly less than what is proposed by the relief requests, we will submit actual weld examination coverage results following each refueling outage for your review.

These relief requests have been reviewed by the Surry Station Nuclear Safety and Operating Committee. In order to support the Unit 1 refueling outage, we request your review and concurrence of the revised relief request for Unit 1 by November 1, 1993, to support detailed outage planning for the Unit 1 refueling outage currently scheduled to begin in February 1994. If you have any questions concerning these requests please contact us.

Very truly yours,

W/Ste W. L. Stewart

Attachments

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 1 Surry Power Station Unit 1 Pressurizer Weld Examinations

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RELIEF REQUEST NO. SR-005 (Revised)

I. IDENTIFICATION OF COMPONENTS

<u>Weld#</u>	<u>Component ID#</u>	Description	<u>Class</u>
1-07	1-RC-E-2	shell to head	1
1-15	1-RC-E-2	longitudinal	1

II. IMPRACTICAL CODE REQUIREMENTS

The 1980 Edition of ASME Section XI, Category B-B, items B2.11 and B2.12 requires a volumetric examination of 100% of the circumferential shell to head weld and 1 foot of the intersecting longitudinal weld.

III. BASIS FOR RELIEF

The pressurizer is covered with an insulation support ring (attachment 1). The insulation support ring is 6 inches wide, where it interferes with the examination. This ring prevents complete volumetric coverage of both the upper shell to head weld and intersecting longitudinal weld. Total removal of the insulation support ring is considered impractical due to high anticipated exposure levels estimated at 18.4 man-rem. Partial removal of the support ring at the mechanical connection would some increase in allow coverage near the mechanical connection, where the support ring could be spread apart. However, the actual area of weld made accessible to this increased coverage is estimated to be very small in relation. to the overall weld length, because the insulation support structure is rigid, interconnected with cross supports, and welded to the supports for the safety valves and power operated relief valves. The intersection the of circumferential shell to head and longitudinal welds is physically located behind one of these supports. Examination coverage of this area would not be improved by partial removal at the mechanical connection.

Any removal of the mechanical connection and spreading apart of the insulation support structure would increase the risk of misalignment problems, and warping of the structure. This risk coupled with the marginal increase in examination coverage, makes partial removal of the insulation support structure also impractical.

IV. ALTERNATE PROVISIONS

A volumetric examination will be performed to the extent practical on welds 1-07 and 1-15. No extended beam path examinations can be performed, since the pressurizer is a clad vessel. The estimated coverage in the perpendicular beam path directions are detailed in attachment 2. The parallel beam path estimates are as follows:

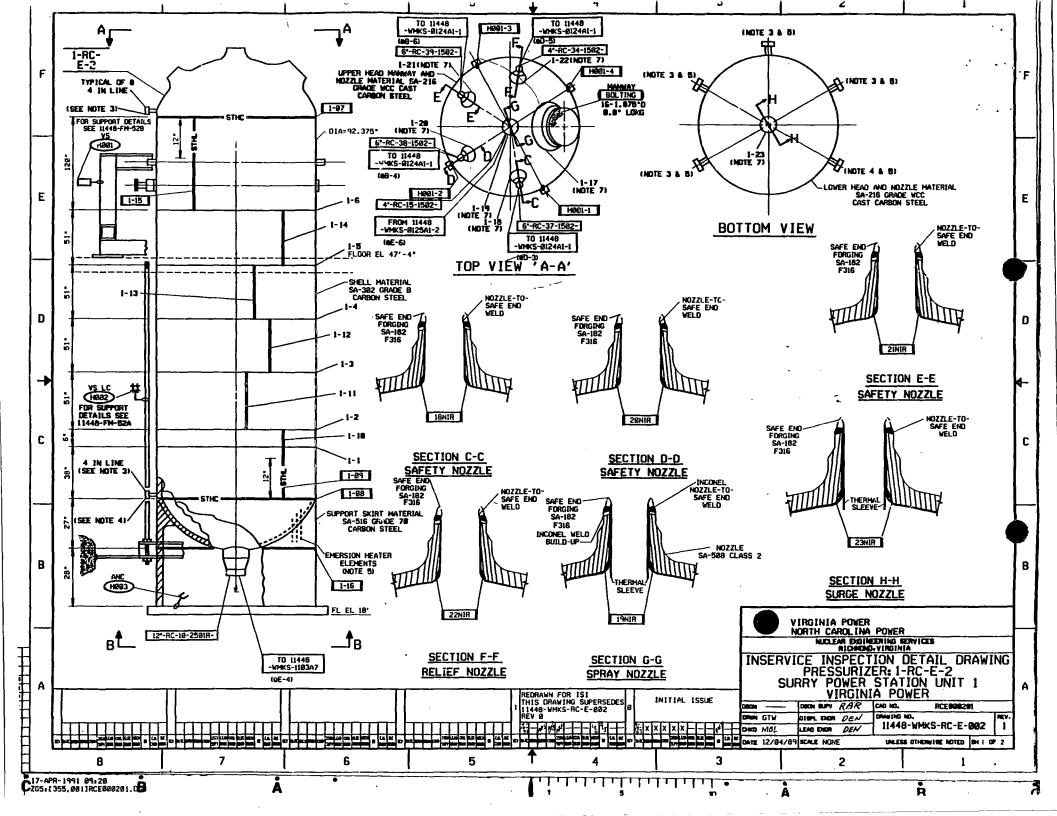
<u>Weld #</u>	<u>45°(7&8)</u>	<u>60°(7&8)</u>
1-07	798	79%
1-15(accessible length only approx. 5")	26%	26%

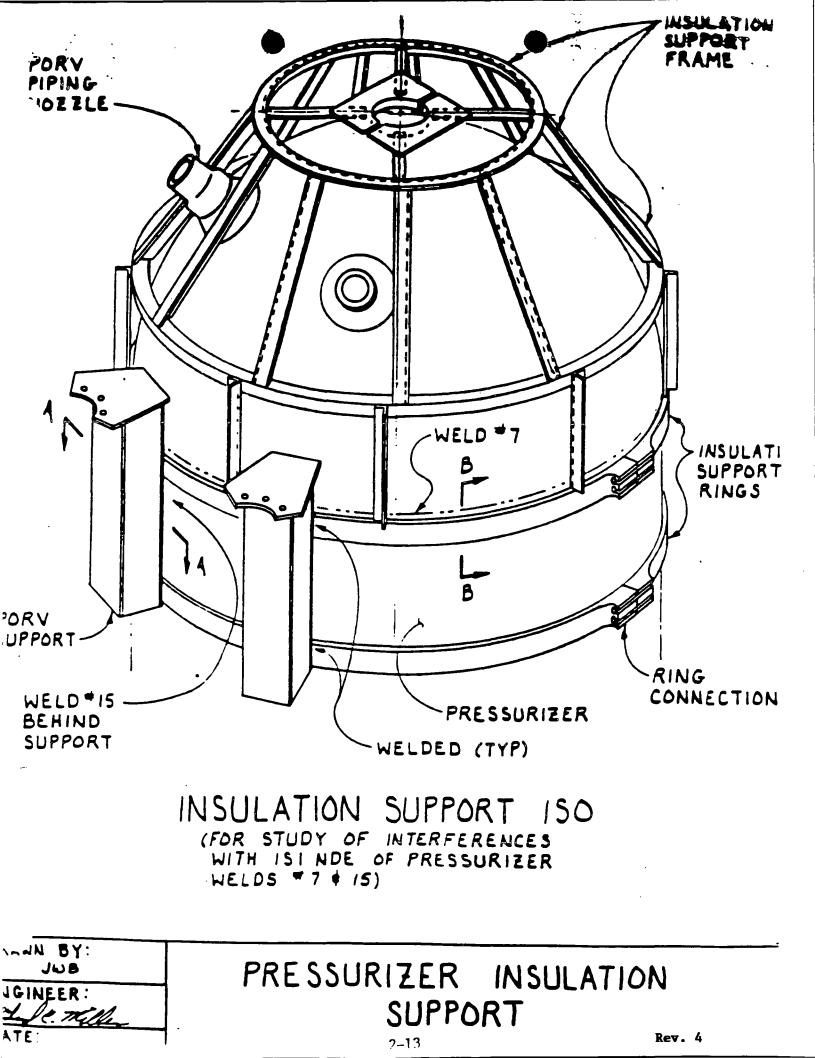


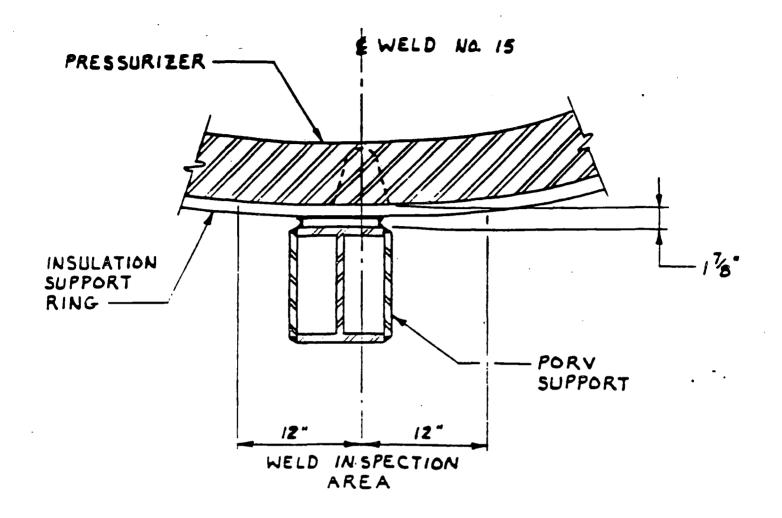
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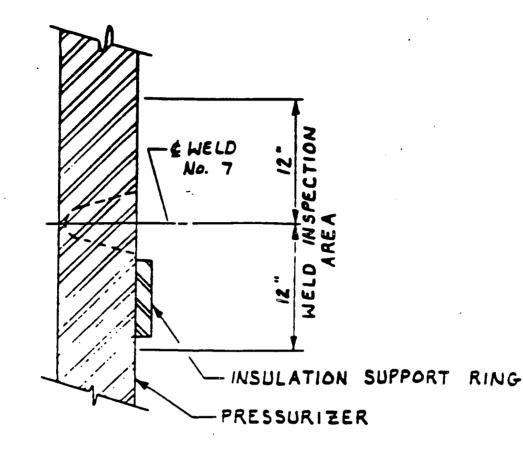




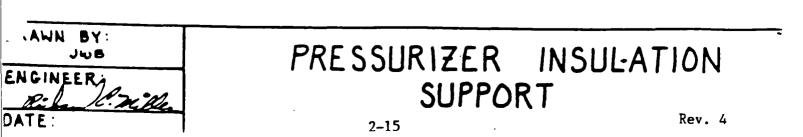
SECTION A-A N. T. S.

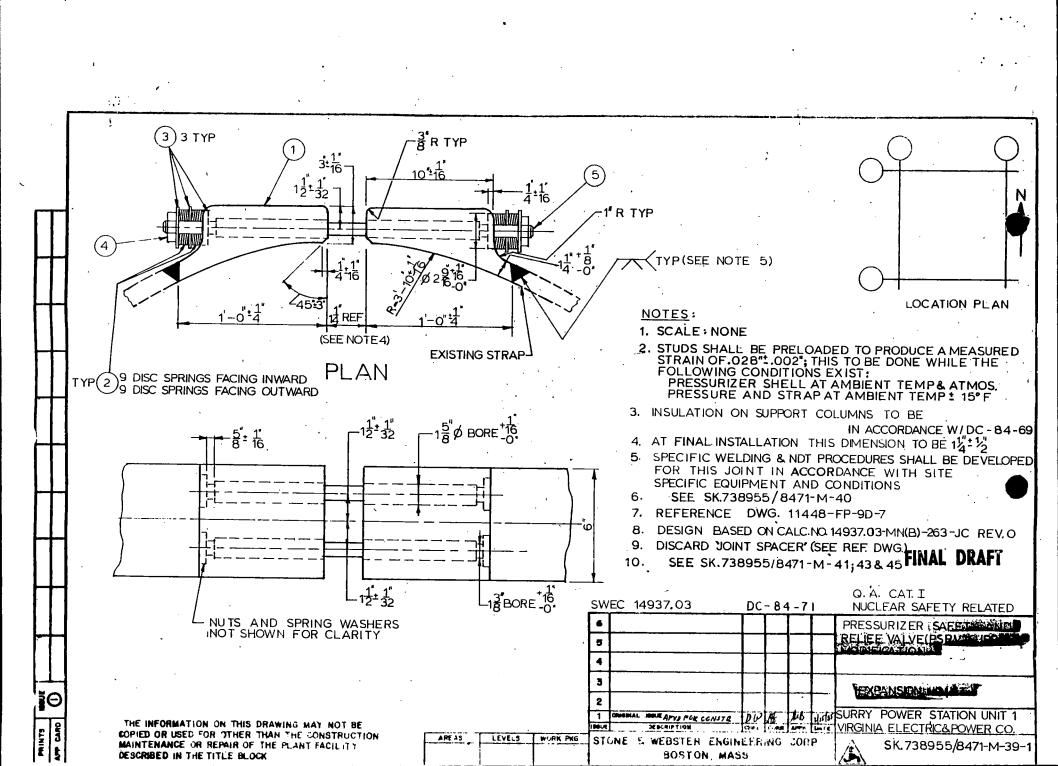
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JWB	
NGINEER :	
Rich C. Willen	

PRESSURIZER INSULATION SUPPORT Rev. 4

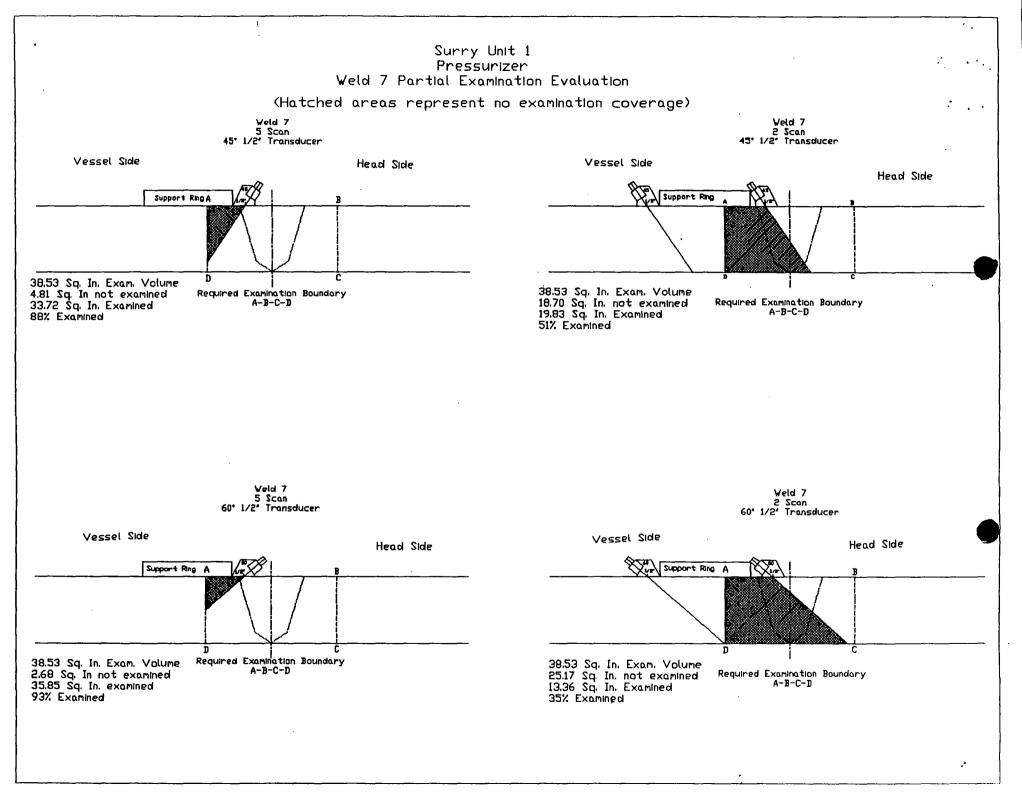


SECTION B-B

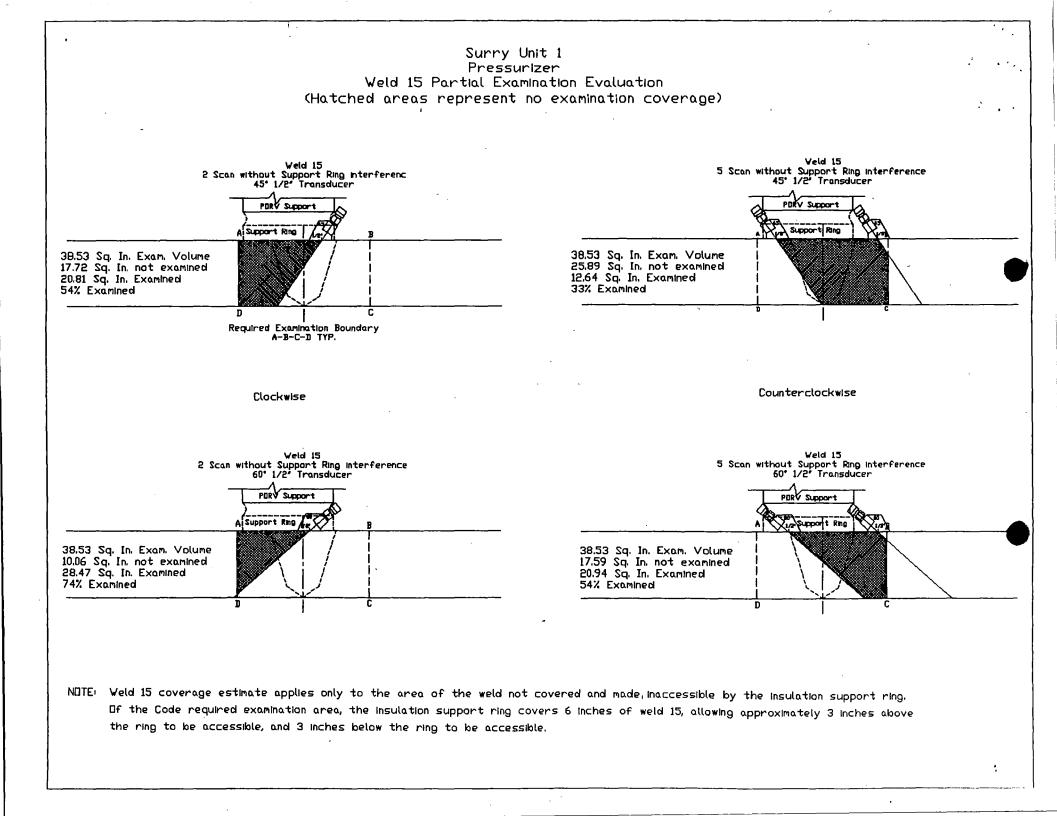


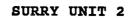






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Attachment 2 Surry Power Station Unit 2 Pressurizer Weld Examinations

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RELIEF REQUEST NO. SR-005 (Revised)

I. IDENTIFICATION OF COMPONENTS

<u>Weld#</u>	Component ID#	Description	<u>Class</u>
1-07	2-RC-E-2	shell to head	1
1-02	2-RC-E-2	longitudinal	1

II. IMPRACTICAL CODE REQUIREMENTS

The 1980 Edition of ASME Section XI, Category B-B, items B2.11 and B2.12 requires a volumetric examination of 100% of the circumferential shell to head weld and 1 foot of the intersecting longitudinal weld.

III. BASIS FOR RELIEF

The pressurizer is covered with an insulation support ring (attachment 1). The insulation support ring is 6 inches wide, where it interferes with the examination. This ring prevents complete volumetric coverage of both the upper shell to head weld and intersecting longitudinal weld. Total removal of the insulation support ring is considered impractical due to high anticipated exposure levels estimated at 18.4 man-rem. Partial removal of the support ring at the mechanical connection would increase in coverage near the mechanical allow some connection, where the support ring could be spread apart. However, the actual area of weld made accessible to this increased coverage is estimated to be very small in relation to the overall weld length, because the insulation support structure is rigid, interconnected with cross supports, and welded to the supports for the safety valves and power relief valves. The intersection of operated the circumferential shell to head and longitudinal welds is physically located behind one of these supports. Examination coverage of this area would not be improved by partial removal at the mechanical connection.

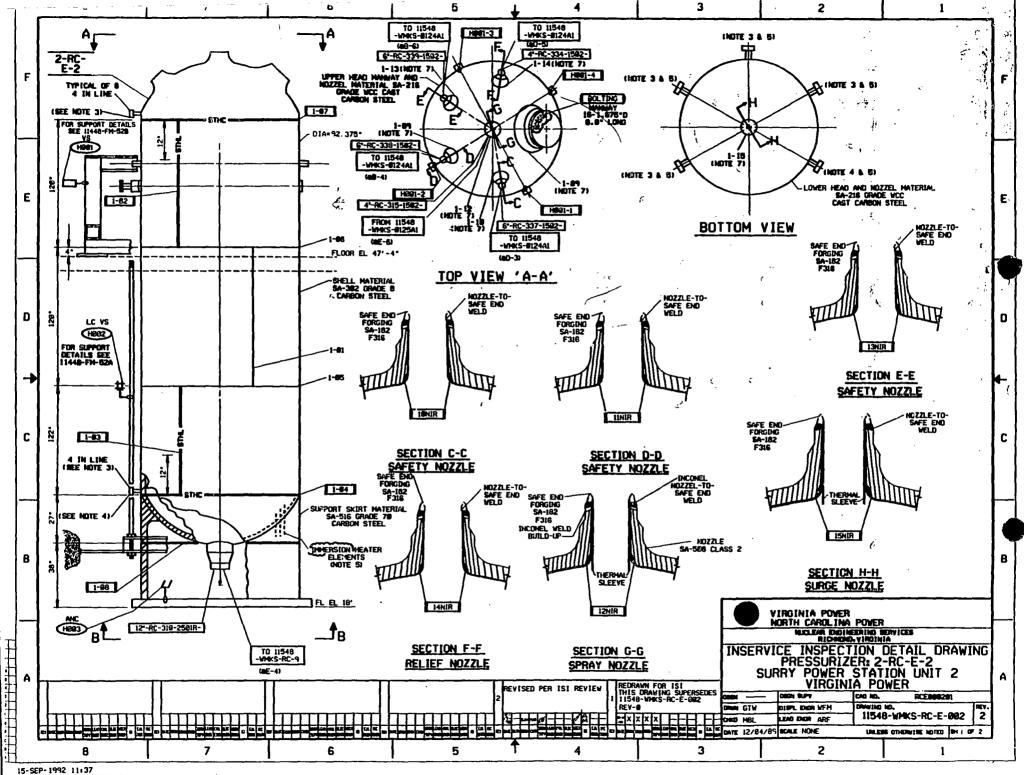
Any removal of the mechanical connection and spreading apart of the insulation support structure would increase the risk of misalignment problems, and warping of the structure. This risk coupled with the marginal increase in examination coverage, makes partial removal of the insulation support structure also impractical.

IV. ALTERNATE PROVISIONS

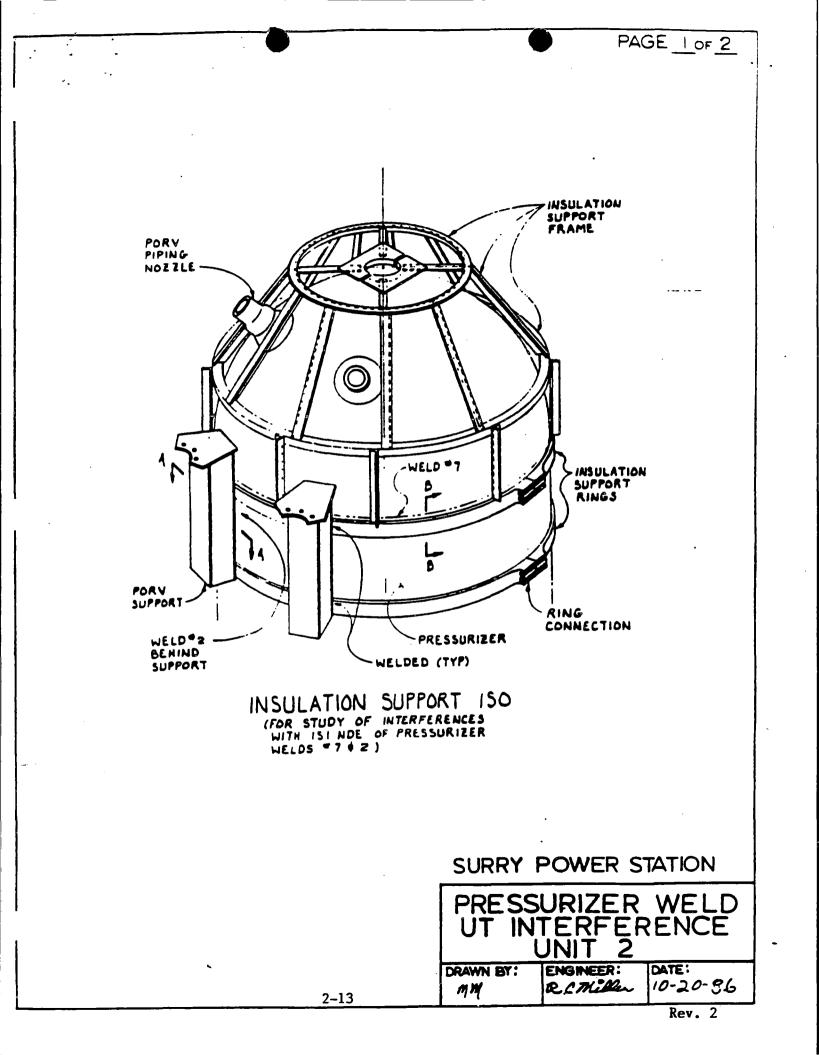
A volumetric examination will be performed to the extent practical on welds 1-07 and 1-02. No extended beam path examinations can be performed, since the pressurizer is a clad vessel. The estimated coverage in the perpendicular beam path directions are detailed in attachment 2. The parallel beam path estimates are as follows:

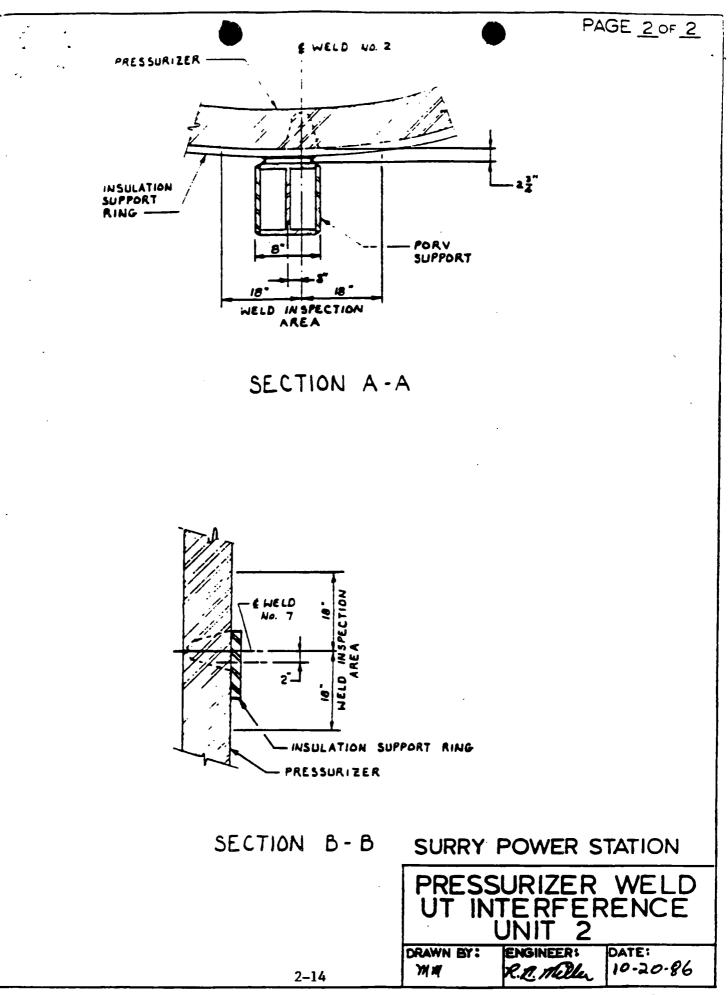
<u>Weld #</u>	<u>45°(7&8)</u>	<u>60°(7&8)</u>
1-07	26%	26%
1-02(accessible length only approx. 7.5")	100%	100%

ATTACHMENT 1



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Rev. 2

