

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 11, 1989

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

Serial No. 89-388
MWH/ETS
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
RESPONSE TO GENERIC LETTER 89 - 08
EROSION / CORROSION - INDUCED PIPE WALL THINNING

NRC Generic Letter 89-08, Erosion/Corrosion-Induced Pipe Wall Thinning, has requested holders of operating licenses to provide assurances that a systematic erosion/corrosion program has been implemented for single phase and two phase high energy carbon steel lines.

The Company has implemented a Secondary Piping Inspection Program which consists of a systematic and formalized erosion/corrosion monitoring program for carbon steel, high energy, secondary piping components. The Secondary Piping Inspection Program has been developed to provide a standardized method of identifying, inspecting, evaluating, and tracking piping components in the secondary side systems at the nuclear stations which are potentially susceptible to erosion/corrosion (single or two phase flow).

The inspection program was initiated after the pipe rupture at Surry Nuclear Station Unit 2 on December 9, 1986. The initial program used during the resulting forced outage is described in previous Company correspondence to the NRC noted in the Attachment .

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The Secondary Pipe Inspection Program has been upgraded to incorporate lessons learned during subsequent inspections and it does meet the intent of the current NUMARC guidelines. It encompasses the following areas:

- Responsibilities
- Historical Development of System and Component Selection Criteria
- Inspection Plans and Component Inspection Lists
- NDE Inspection Procedures
- Data Evaluation Methodology
- Component Tracking for Future Outage Inspections
- EPRI Computer Codes - CHEC/CHECMATE

The Secondary Inspection Program is currently implemented by station and NDE procedures. This program will be controlled for long term application by formally incorporating it into the Nuclear Design Control Program by January 1, 1990.

The information provided in this response is true and accurate to the best of my knowledge.

Very truly yours,



W. L. Stewart
Senior Vice President - Power

Attachment

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

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

Mr. J. L. Caldwell
NRC Senior Resident Inspector
North Anna Power Station

ATTACHMENT
VIRGINIA ELECTRIC AND POWER COMPANY
EROSION/CORROSION CORRESPONDENCE TO THE NRC

1. January 14, 1987 letter to Dr. J. Nelson Grace, Regional Administrator USNRC, Region II from W. L. Stewart, Vice President - Nuclear Operations, Virginia Electric and Power Company, Serial No. 87-009, Reactor Trip and Feedwater Pipe Rupture.
2. March 6, 1987 letter to Dr. J. Nelson Grace, Regional Administrator USNRC, Region II from W. L. Stewart, Vice President - Nuclear Operations, Virginia Electric and Power Company, Serial No. 87-108, Feedwater Pipe Repair
3. April 16, 1987 letter to USNRC Document Control Desk, from W. L. Stewart, Vice President - Nuclear Operations, Virginia Electric and Power Company, Serial No. 87-108A, Feedwater Piping Examination and Evaluation.
4. September 11, 1987 letter to USNRC Document Control Desk, from W. L. Stewart, Vice President - Nuclear Operations, Virginia Electric and Power Company, Serial No. 87-427, Response to IE Bulletin 87-01.

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by W. L. Stewart who is Senior Vice President - Power, of Virginia Electric and Power Company. 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.

Acknowledged before me this 11 day of July, 1989.

My Commission Expires: February 25, 1990.

Vicki L. Null
Notary Public

(SEAL)