

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 10, 1990

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

Serial No. 90-504
NL&P
Docket No. 50-280
License No. DPR-32

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 1
INSERVICE INSPECTION PROGRAM
EXEMPTION REQUEST FROM ASME SECTION XI
HYDROSTATIC PRESSURE TEST

Pursuant to 10 CFR 50.55a(g)(5), an exemption is requested from certain post replacement test requirements identified in ASME Section XI, 1980 edition, Winter 1980 addenda for three ASME class 2 valves. During the Fall 1990 refueling outage for Surry Unit 1, which is presently scheduled to commence on October 5, 1990, three valves, 1-FW-27, 1-FW-58, and 1-FW-89, are scheduled for replacement. These 3 inch swing check valves have experienced internal leakage. The replacement valves are tilting disc check valves which meet or exceed the original specification requirements.

Following replacement welding, IWA-5214 of ASME Section XI requires that a hydrostatic test (IWC-5222) be performed with a corresponding VT-2 examination on the affected area. As no intermediate isolation exists, the required test would place the three steam generators (1-RC-E-1A, 1-RC-E-1B, and 1-RC-E-1C) within the hydrostatic test boundary. Hydrostatic testing of steam generators is difficult and considered impractical for this situation.

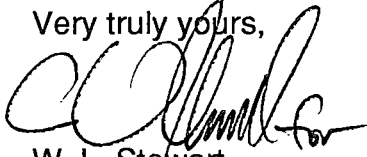
Alternatively, it is proposed that a volumetric examination (RT) and a surface examination (PT) be performed on the new welds in lieu of the hydrostatic test. For a similar application, these alternative inspections were previously requested on August 29, 1989 (Serial No. 89-636) and approved by the NRC on October 2, 1989, for Surry Unit 2.

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In summary, we believe that the proposed alternative examinations provide the necessary assurance intended by the Code and that the basis is consistent with previously approved requests. If you have any questions or require additional information, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. L. Stewart', written over the typed name.

W. L. Stewart
Senior Vice President - Nuclear

Enclosure

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

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