## VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

January 21, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Albert Schwencer, Chief
Operating Reactors Branch 1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 036 PO/FHT:scj Docket No. 50-338 License No. NPF-4

Dear Mr. Denton:

## North Anna Unit 1 Steam Generator Repairs Acceptability of ASME Code Case N-210

Based on discussions with members of your staff on December 27, 1979, (Messrs. W. Hazleton and G. Johnson) we understand that application of ASME Code Case N-210 is acceptable in the exemption from the hydro test requirement for certain repairs performed on North Anna Unit 1's steam generators.

The repairs performed consisted of replacement of several three-quarter inch root isolation valves for steam generator level and main steam line flow transmitter sensing lines. The application of Code Case N-210 was required because of the impracticality of hydrostatically testing these valves. In each case, the high side of the valve is not isolable from the steam generators. A hydrostatic test of the valve would involve a hydrostatic test of the steam generators themselves.

After valve replacement, dye penetrant tests confirmed that the repairs were satisfactory and additional visual inservice leakage examinations are scheduled when the plant is returned to temperature and pressure.

Additional basis for acceptability of the application of Code Case N-210 to this repair is contained in Draft Regulatory Guide, Inservice Inspection Code Case Acceptability ASME Section XI Division 1, dated August, 1979. Section C, Regulatory Position, paragraph 1, of the subject Draft Regulatory Guide lists Code Case N-210 as, "acceptable for application in the inservice inspection of components and their supports for water-cooled nuclear power plants".

In light of the foregoing, and as agreed to by Messrs. Hazelton and Johnson, hydrostatic testing of the replacement valves was not performed.

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If you have any questions or require additional information, please contact this office.

Very truly yours,

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C. M. Stallings Vice President-Power Supply and Production Operations

cc: Mr. James P. O'Reilly