VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

August 14, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial Nos. 496
NO/JHL/lms
Docket No. 50-338
License No. NPF-4

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT NO. 1
RELIEF REQUEST

In accordance with 10 CFR 50.55a, paragraph (g)(5), we are requesting relief from hydrostatic testing requirements for North Anna Unit No. 1 as described below.

ASME XI, 1974 Edition with Summer 1975 Addenda, Subsection IWA-4000, requires hydrostatic testing after weld repairs. Two 150 lb. cast body gate valves (MOV-RS-155A and MOV-RS-155B) located on the suction lines to the Outside Recirculation Spray Pumps (line numbers 12"-RS-7-153A-Q2 and 12"-RS-8-153A-Q2) were replaced with two 300 lb. forged body gate valves (see enclosed figure). These valves have been replaced because of leakage problems. The quality of the welds joining the new valves to the piping have been tested by liquid penetrant examination and by 100% radiography. The welds have also been ultrasonically tested.

ANSI B31.7-1969 with addenda through 1970, Code Cases 78, 81, 83R and 115, requires pressure testing the welds to either 1.25 times the design pressure by hydrostatic test or 1.20 times the design pressure by pneumatic test. Design pressure for these lines is 55 psig, resulting in a required hydrostatic test pressure of 68.75 psig or a pneumatic test pressure of 66 psig. The welds on the downstream side of these valves were successfully tested hydrostatically. The inability to test the welds on the upstream side of the valves is because these lines are open-ended at the containment sump and an effective seal cannot be maintained. During attempts to seal these lines so they can be hydrostatically tested, workers spent many hours in a radiation area. Additional radiation exposure would be accumulated by workers, in the sump area, to test these welds.

During the recently completed pressure test of the reactor containment, the welds on both sides of the new valves were exposed to the test pressure (44.4 psig) for the duration of the test. No leakage was observed.

Rec'd w/ check #37447 for $150.00

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We have determined that the examinations already performed on these welds provide adequate indication of weld integrity. Therefore, hydrostatic testing of these welds should not be necessary. Enclosed is a check for $150.00 for the application review fee.

Approval of this relief request is needed prior to Unit 1 startup which is currently scheduled for September 1, 1984.

Very truly yours,

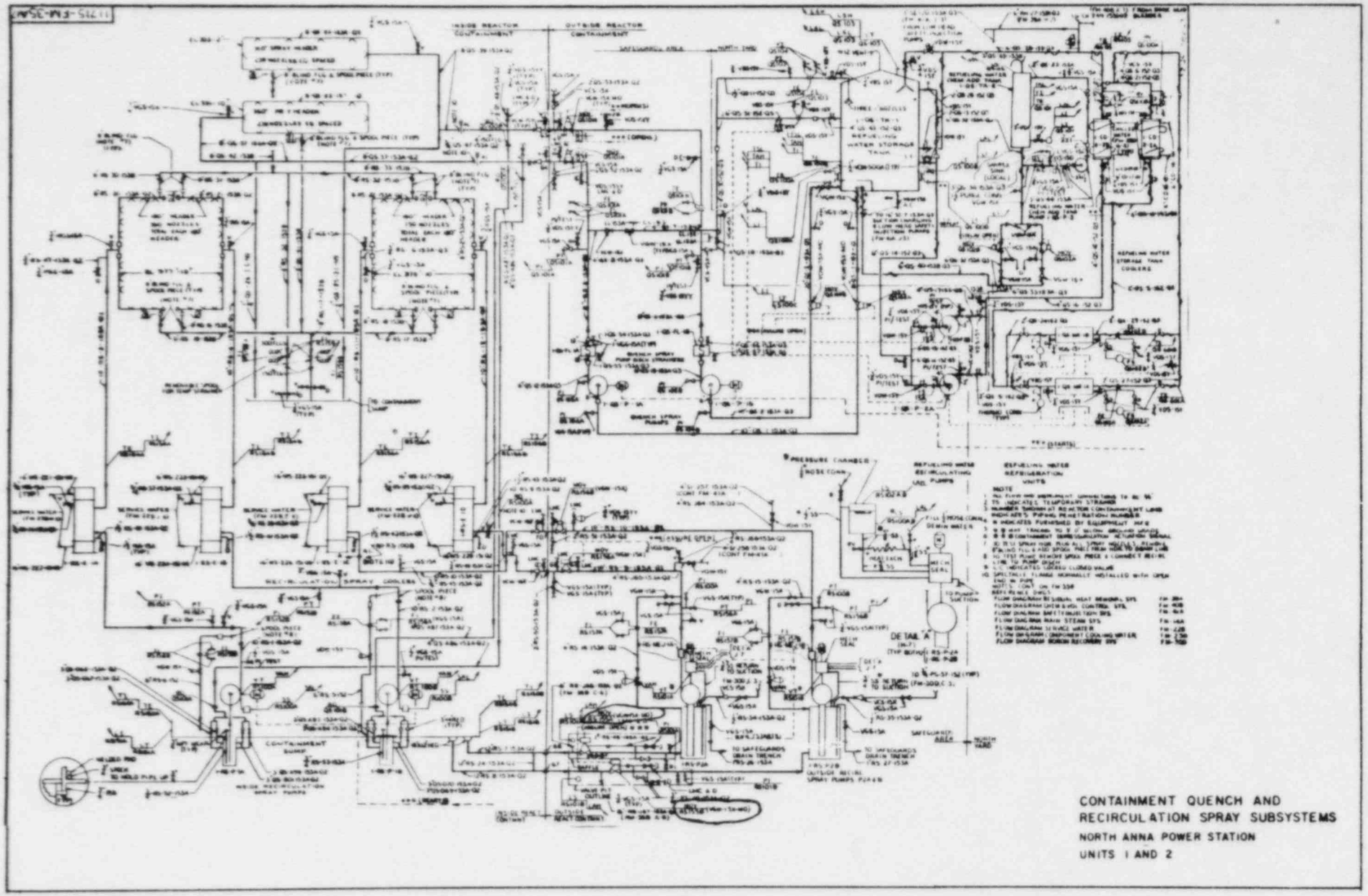
W. L. Stewart

Enclosure

cc: Mr. James P. O'Reilly
Regional Administrator
Region II

Mr. Richard C. DeYoung
Office of Inspection and Enforcement
Washington, D. C. 20555

Mr. M. W. Branch
NRC Resident Inspector
North Annna Power Station


INSIDE REACTOR CONTAINMENT
OUTSIDE REACTOR CONTAINMENT
DETAIL A
CONTAINMENT QUENCH AND
RECIRCULATION SPRAY SUBSYSTEMS
NORTH ANNA POWER STATION
UNITS 1 AND 2