

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

December 7, 1995

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

Serial No. 95-602  
NLOS/GSS/ETS  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**NORTH ANNA POWER STATION UNITS 1 & 2**  
**REQUEST FOR USE OF ASME SECTION XI CODE CASES**  
**THIRD INTERVAL INSERVICE INSPECTION PROGRAMS**

Code Case N-522, "Pressure Testing of Containment Penetration Piping," and Code Case N-535, "Alternative Requirements for Inservice Inspection Intervals," are not currently approved for use by Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability ASME Section XI Division 1. Footnote 6 of 10 CFR 50.55a states that other Code Cases may be authorized upon request pursuant to 10 CFR 50.55a(a)(3). In accordance with these provisions, permission is requested to utilize these Code Cases in North Anna's ASME Section XI Inservice Inspection Program.

Code Case N-522 permits the use of Appendix J leakage testing requirements as an alternative to the rules in the Code that govern the pressure testing of certain containment penetrations. Application of this Code case will reduce the pressure testing requirements for these containment penetrations consistent with the Appendix J performance-based testing requirements for containment penetrations.

Code Case N-535 interprets interval inspection scheduling requirements and allows both interval and period extensions of up to one year to enable an inspection to coincide with a plant outage. Application of this Code Case would provide additional inspection scheduling flexibility in completing period-specific inspections allowing better application of inspection resources during refueling outages.

Currently North Anna Unit 1 is scheduled for a refueling outage in February of 1996 and North Anna Unit 2 is scheduled for a refueling outage in October of 1996. It is requested that consideration for approval be completed in time to support the October

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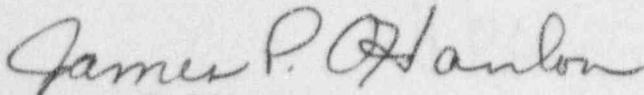
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1996 outage as both these cases could affect outage inservice inspection requirements and resources.

If you have any questions, please contact us.

Very truly yours,



James P. O'Hanlon  
Sr. Vice President-Nuclear

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North Anna Power Station