

# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

### SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

### OF THE SECOND TEN YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN

### REQUEST FOR RELIEF NO. NDE-22

FOR

## VIRGINIA ELECTRIC AND POWER COMPANY

### NORTH ANNA POWER STATION, UNIT 2

### DOCKET NUMBER: 50-339

### 1.0 INTRODUCTION

The Technical Specifications for North Anna Power Station, Unit 2 state that the inservice inspection of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulties without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design. geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first ten-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the North Anna Power Station, Unit 2 second 10-year inservice inspection (ISI) interval is the 1986 Edition. The components (including supports) may meet the requirements set forth in subsequent editions and addenda of the ASME Code incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to Commission approval.

Pursuant to 10 CFR 50.55a(g)(5), if the licensee determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information shall be submitted to the Commission in support of that determination and a request made for relief from the ASME Code requirement. After evaluation of the determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and may impose alternative requirements that are determined to be authorized by law, will not endanger life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed. In a letter dated April 3, 1995, Virginia Electric and Power Company submitted to the NRC its Second Ten-Year Interval Inservice Inspection Program Plan Request for Relief No. NDE-22 for the North Anna Power Station, Unit 2.

#### 2.0 EVALUATION AND CONCLUSIONS

The staff, with technical assistance from its contractor, the Idaho National Engineering Laboratory (INEL), has evaluated the information provided by the licensee in support of its Second Ten-Year Interval Inservice Inspection Program Plan Request for Relief No. NDE-22 regarding Examination Category B-F, Item B5.70, Steam Generator Dissimilar Metal Nozzle-to-Safe End Butt Welds for the North Anna Power Station, Unit 2.

Based on the information submitted, the staff adopts the contractor's conclusions and recommendations presented in the Technical Letter Report attached. The staff concludes that performing 100% of the Code-required ultrasonic examination of the subject nozzle-to-safe end welds would result in a hardship without a compensating increase in safety, and that examining these welds to the extent practical will provide reasonable assurance of operational readiness. Therefore, the licensee's proposed alternative is authorized for the **preservice** examinations only, pursuant to 10 CFR 50.55a(a)(3)(ii). Due to changes in technologies and techniques, it may become possible to examine 100% of these welds in the future. Therefore, this alternative is not authorized for subsequent inservice examinations.