VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

February 7, 1996

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555

Serial No. NL&OS/EJW 96-032

Docket No.

50-338 50-339

License No.

NPF-4 NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION UNITS 1 AND 2 INSERVICE INSPECTION REQUEST FOR RELIEF

By letter Serial No. 93-018, dated February 16, 1993, we submitted Relief Request NDE-18 for North Anna Unit 1 and Unit 2 inservice inspection (ISI) examinations. Relief Request NDE-18 was conditionally granted by letters dated August 7, 1995, "Evaluation of the Second Ten-Year Interval Inspection program Plan, Revision 4 and Associated Requests for Relief/North Anna Power Station, Unit No. 1 (NA-1) (TAC No. M89620)," and August 8, 1995, "Evaluation of the Second Ten-Year Interval Inspection program Plan, Revision 3 and Associated Requests for Relief/North Anna Power Station, Unit No. 2 (NA-2) (TAC No. M89740)." Due to the omission of certain terminal end piping welds connected to each unit's regenerative heat exchanger, we are submitting revised relief requests (Attachments 1 and 2) to include these welds.

The alternative requirements proposed for these welds are similar to the guidelines established by your previous evaluation of the regenerative heat exchanger. The revised relief requests are submitted pursuant to 10 CFR 50.55a(g)(5) and have been approved by the North Anna Station Nuclear Safety and Operating Committee.

North Anna Power Station Unit 1 is currently in the second period of its second ten year interval. The interval is scheduled to end December 24, 1998. The Code of reference for North Anna Unit 1 is the 1983 Edition, Summer 1983 Addendum of ASME Section XI.

North Anna Unit 2 is presently in the second period of the second ten-year interval. Examinations are being conducted in accordance with the requirements of Section XI of the 1986 Edition of the ASME Boiler and Pressure Vessel Code.

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If you have any further questions, please contact us.

Very truly yours,

J. P. O'Hanlon

Senior Vice President - Nuclear

Attachments

cc: U.S. Nuclear Regulatory Commission

Region II

101 Marietta Street, N.W.

Suite 2900

Atlanta, Georgia 30323

R. D. McWhorter NRC Senior Resident Inspector North Anna Power Station

ATTACHMENT 1

NORTH ANNA UNIT 1
RELIEF REQUEST NDE-18 (REVISED)

NORTH ANNA UNIT 1 RELIEF REQUEST NDE-18 (REVISED)

I. IDENTIFICATION OF COMPONENTS

Chemical and Volume Control (CH)

Component: Regenerative Heat Exchanger (1-CH-E-3)
Connecting Circumferential Piping Welds

Welds/Components	Description	Code Item#	Class
3	tubesheet-to-head	B2.60	1
7	tubesheet-to-head	B2.60	1
11	tubesheet-to-head	B2.60	1
4	circumferential head	B2.51	1
8	circumferential head	B2.51	1
12	circumferential head	B2.51	1
13	nozzle-to-vessel	B3.150	1
14	nozzle-to-vessel	B3.150	1
15	nozzle-to-vessel	B3.150	1
16	nozzle-to-vessel	B3.150	1
17	nozzle-to-vessel	B3.150	1
18	nozzle-to-vessel	B3.150	1
13NIR	nozzle inside radius	B3.160	1
14NIR	nozzle inside radius	B3.160	1
15NIR	nozzle inside radius	B3.160	1
16NIR	nozzle inside radius	B3.160	1
17NIR	nozzle inside radius	B3.160	1
18NIR	nozzle inside radius	B3.160	1
19	terminal end weld	B9.21	1
20	terminal end weld	B9.21	1
21	terminal end weld	B9.21	1
22	terminal end weld	B9.21	1
WS-1	welded attachment	B8.40	1
WS-2	welded attachment	B8.40	
WS-3	welded attachment	B8.40	1
WS-4	welded attachment	B8.40	1
WS-5	welded attachment	B8.40	1
WS-6	welded attachment	B8.40	1
1	circumferential head	C1.20	2
5	circumferential head	C1.20	2 2 2
9	circumferential head	C1.20	2
2	tubesheet-to-shell	C1.30	2
6	tubesheet-to-shell	C1.30	2
10	tubesheet-to-shell	C1.30	2
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IDENTIFICATION OF COMPONENTS (Continued):

Welds/Components	Description	Code Item#	Class	
	(Drawing 11715-WMKS	-0103CD)		
21A	terminal end weld	B9.21	1	
	(Drawing 11715-WMKS	S-0111H)		
32	terminal end weld	B9.21	1	

II. IMPRACTICAL CODE REQUIREMENTS

Examination Categories B-B, B-D (Inspection Program B), B-H, B-J, and C-A require that volumetric and surface examinations be performed as indicated by the Code item numbers above.

III. BASIS FOR RELIEF

The regenerative heat exchanger (1-CH-E-3) provides preheat for the normal charging water going into the reactor coolant system (RCS). The preheat is derived from normal letdown water coming from the RCS. Charging and letdown constitute the normal chemical and volume control within the RCS. The heat exchanger itself is actually three heat exchangers in series, interconnected with piping. This fact was previously utilized in limiting examinations to one of the heat exchangers as allowed by the Code. The heat exchanger has an outside shell diameter of 9.55 inches. The shells were manufactured with ASTM A351 CF8 type material. The heads were manufactured with ASTM A240 TP304 material. The 3 inch nozzle necks were manufactured with ASTM A182 F304 material. Until very recently the regenerative heat exchanger was entirely classified ASME Class 2 for inservice inspection activities. However, a reanalysis changed the classification of the letdown side of the heat exchanger to ASME Class 1. This action significantly increases the examination requirements associated with this heat exchanger. Nozzles, which were previously exempt under Class 2 requirements are now required to be examined. Additionally, all Class 1 nozzles are required to be examined, and the examinations are not limited to one heat exchanger.

The nozzle-to-vessel welds and nozzle inside radius sections for this vessel were not designed for ultrasonic examination from the outside diameter of the vessel. The small diameter of the vessel and nozzles along with the cast stainless steel vessel shell prevents a meaningful ultrasonic examination of these components.

III. BASIS FOR RELIEF (Continued):

The Code required volumetric examination on the vessel head circumferential welds is limited due to the weld crown, radius of the closure caps, and the nozzles. The Code required volumetric examination of the tubesheet welds is limited by the weld crown and is obstructed by a support clamp. This clamp must be mechanically removed prior to the welds' examination. Additionally weld 11 is partially obscured by the six integral attachments, which are themselves butted up against a clamp. It is estimated that between 21 and 42 percent of the circumferential welds could be examined, and 42 percent of the tubesheet welds could be examined, if the clamps are removed. Weld 11 would be significantly less due to the integral attachment location. Previous partial examinations completed on these welds have identified no problems.

An ALARA evaluation has been conducted on each activity associated with these examinations. A table is provided documenting these results. It is estimated that more than 26 man-rem will be required to complete these examinations over the interval. This estimate assumes optimum inspection and preparation times. If difficulties are encountered, a corresponding increase in dose would be expected. Shielding is not considered practical since the source of radiation is the component receiving the examinations. Considering the examination limitations previously discussed, expending this much dose is deemed impractical.

This relief request was originally submitted by letter Serial No. 93-018, dated February 16, 1993. The relief was granted ("provided that the lower regenerative heat exchanger receives the Code-required examinations to the extent possible") by letter dated August 7, 1995, and its associated safety evaluation report. This request is being revised to add four of six terminal end piping-to-vessel welds which are required to be selected for examination under Category B-J note 1(a) under item B9.21. These welds were omitted from the original request and need to be addressed in this relief request in addition to those already evaluated. New survey maps of the regenerative heat exchanger indicate higher dose rates than previously estimated (survey attached). Performing these surface examinations would result in approximately 10.5 man-rem of exposure and would negate, to a large degree, the exposure reduction of the original relief request. This is due to the close proximity of the regenerative heat exchanger to these welds and the need for scaffolding and insulation removal, which were previously eliminated for the regenerative heat exchanger in our original relief request.

IV. ALTERNATE REQUIREMENTS

Technical Specifications require that the RCS Leak Rate be limited to 1 gallon per minute unidentified leakage. This value is calculated every 72 hours in accordance with Technical Specification requirements. Additionally, the containment atmosphere particulate radioactivity is monitored every 12 hours per Technical Specification requirements. As a result, new leakage is rapidly identified and located during operation. Leakage identified from these components can be easily isolated by two upstream valves with manual operation from within the control room. The valves also receive an automatic control signal to close on inventory loss based on pressurizer level. However, these valves could not be used as the Class 1 boundary valves due to their nonsafety-related actuation. Correspondingly, as a result of the reclassification to Class 1, these components will receive a system leakage test prior to start up after each refueling outage. During this system leakage test the components will receive a visual (VT-2) examination. The support structures will receive a visual (VT-3) examination to the extent required by the Code without insulation removal.

Your evaluation of our original relief request, dated August 7, 1995, added alternative requirements. The appropriate portion of the Technical Evaluation Report follows:

Based on the statement by the licensee that previous partial examinations have been completed on these welds, it is concluded that a best effort volumetric examination of the lower RHX, in addition to system radiation monitoring and the Code required visual examinations, would provide a reasonable assurance of the system's inservice structural integrity. Therefore, pursuant to 10 CFR 50.55a(g)(6)(i), it is recommended that relief be granted provided the lower RHX vessel receives Code-required volumetric examinations to the extent possible.

We would also request that this philosophy of inspection be extended to the vessel-to-piping terminal end welds on the regenerative heat exchanger. The two lower RHX vessel-to-piping terminal end welds (22 & 21A) will be examined by the surface method as required by the Code.

NORTH ANNA UNIT 1 1-CH-E-3 EXAMINATIONS MAN-REM ESTIMATE

Work Task	Man-Hours (hrs)	Dose Rate (R/hr)	Man-Rem
Insulation Remove/Install	5.3	0.500	2.650
Scaffolding Install/Remove	1.0	0.350	0.350
Clamp Remove/Install	2.0	1.000	2.000
Weld Prep.	3.5	1.000	3.500
HP Coverage	31.0	0.010	0.310
Nozzle-to-Vessel Inspection (UT)	6.0	1.000	6.000
Nozzle Inside Rad Inspection (UT)	ius 4.5	1.000	4.500
Circumferential/Tu Inspection (UT)	besheet 4.0	1.000	4.000
Welded Attachmer Inspection (PT)	nt 3.0	1.000	3.000
		Total Estimate	= 26.310

NORTH ANNA UNIT 1 1-CH-E-3 PIPING TERMINAL ENDS EXAMINATIONS MAN-REM ESTIMATE

6 Terminal End Welds

Work Task	Man-Hours (hrs)	Dose Rate (R/hr)	Man-Rem
Insulation Remove/Install	2.0	2.000	4.0
Scaffolding Install/Remove	1.0	1.500	1.5
Weld Prep.	1.0	2.000	2.0
PT Exam 6 Welds	1.5	2.000	3.0
		Total Estimate	= 10.5

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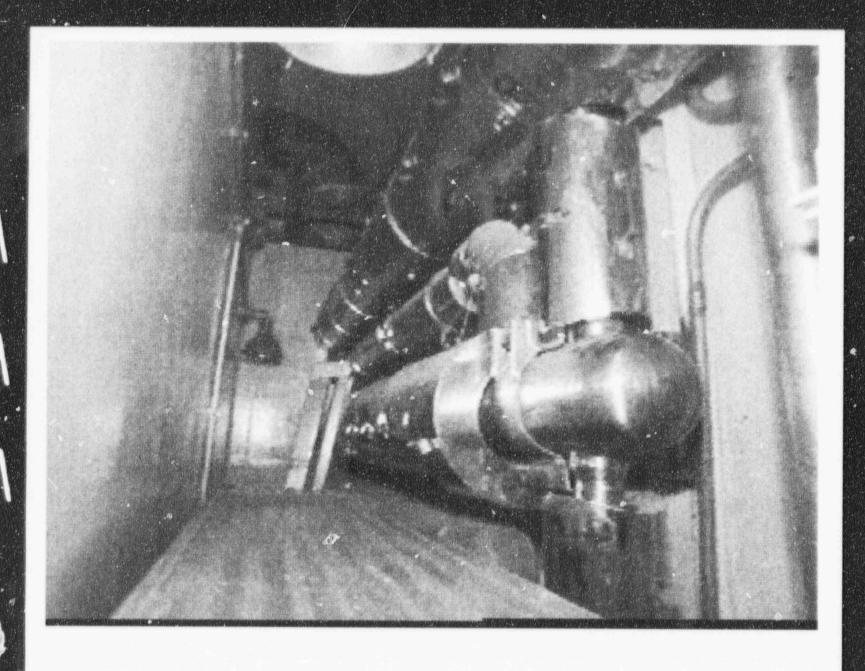
NORTH ANNA POWER STATION

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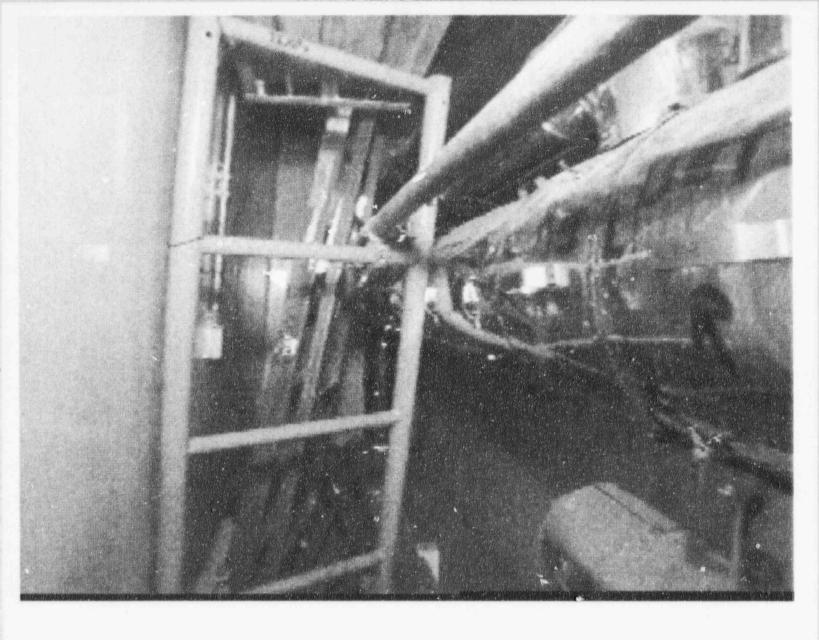
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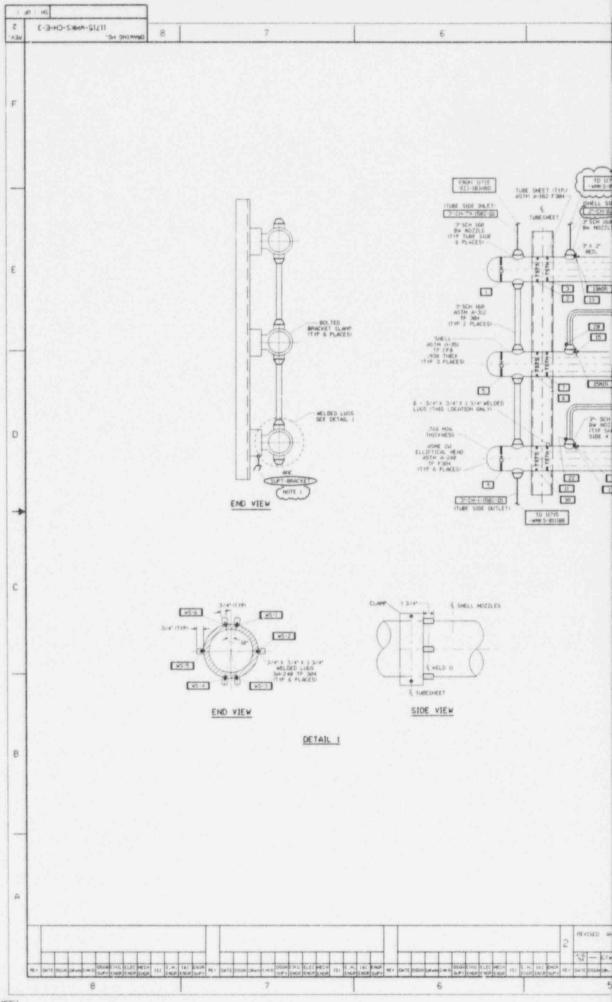
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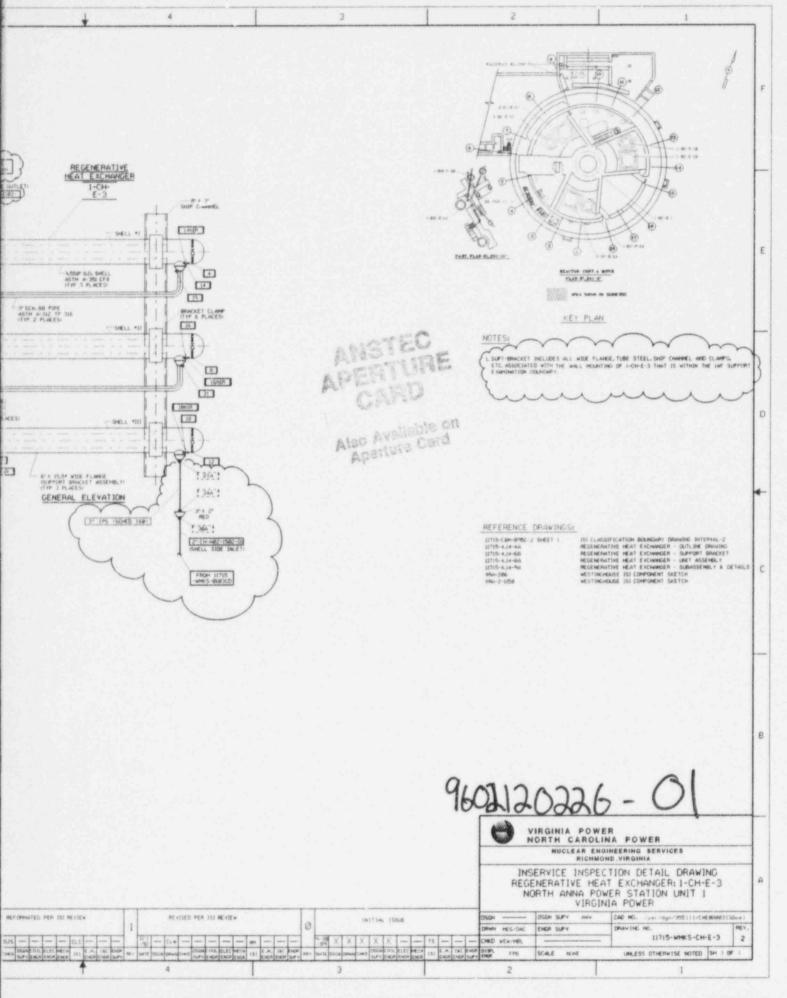
North Anna Unit 1 Regenerative Heat Exchanger middle and upper shell



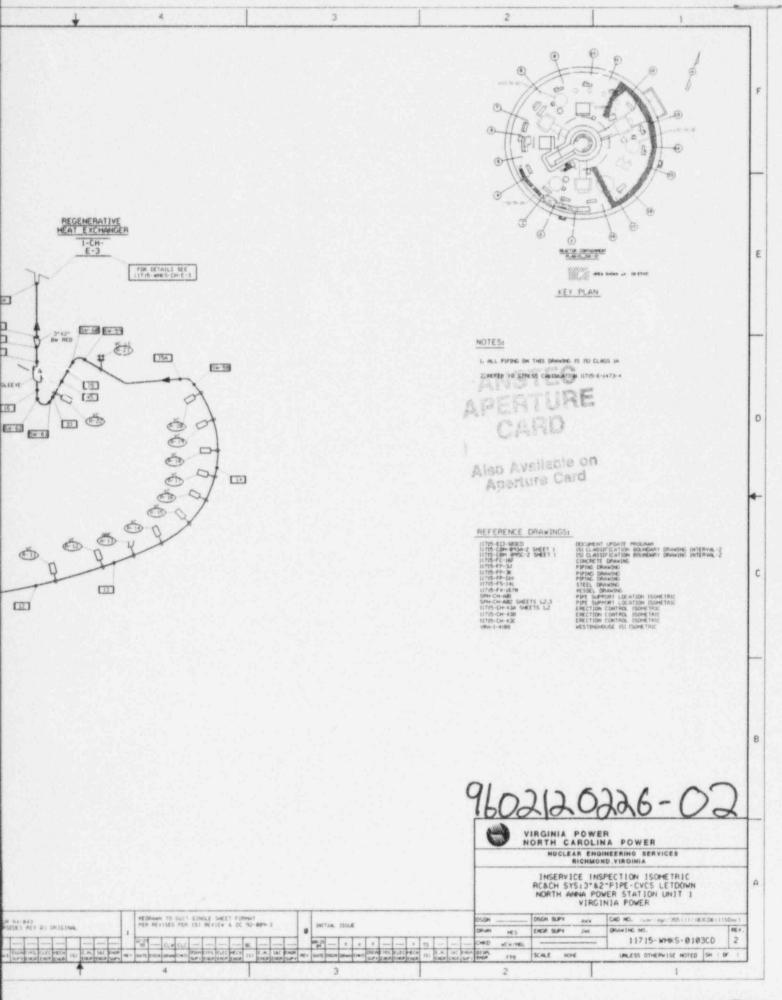
North Anna Unit 1 Regenerative Heat Exchanger lower shell



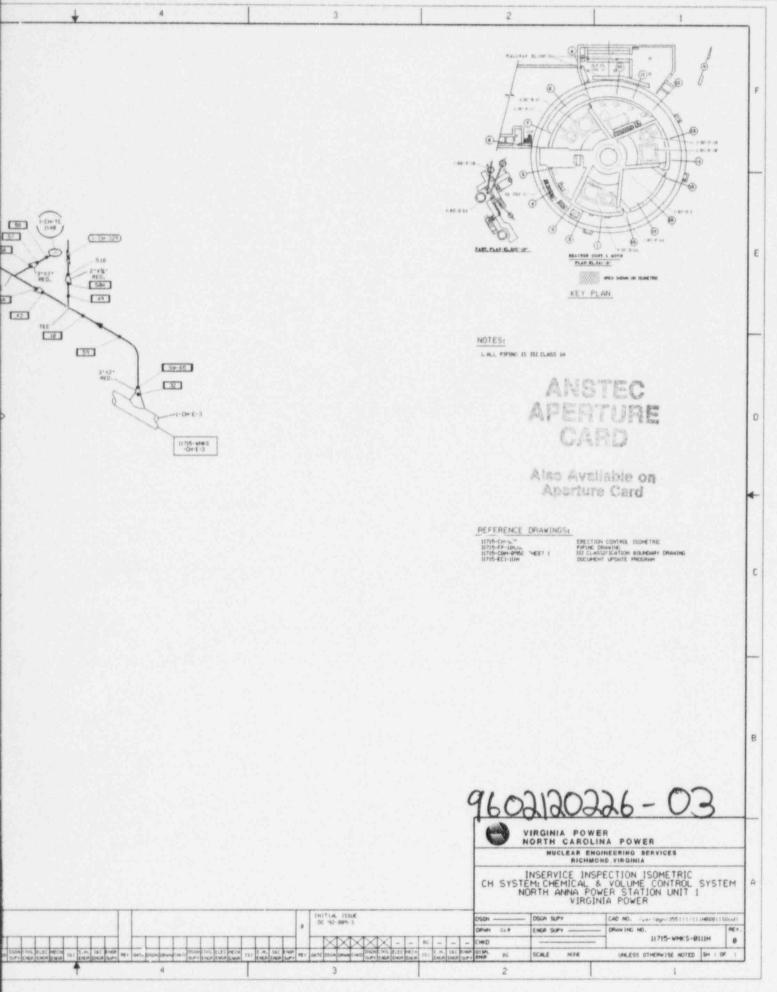
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ATTACHMENT 2

NORTH ANNA UNIT 2
RELIEF REQUEST NDE-18 (REVISED)

NORTH ANNA UNIT 2 RELIEF REQUEST NDE-18 (REVISED)

1. IDENTIFICATION OF COMPONENTS

System: Chemical and Volume Control (CH)

Component: Regenerative Heat Exchanger (1-CH-E-3)

Connecting Circumferential Piping Welds

(Drawing 12050-WMKS-CH-E-3)

Welds/Components	Description	Code Item#	Class
8	tubesheet-to-head	B2.60	1
10	tubesheet-to-head	B2.60	1
12	tubesheet-to-head	B2.60	1
2	circumferential head	B2.51	1
4	circumferential head	B2.51	1
6	circumferential head	B2.51	1
13	nozzle-to-vessel	B3.150	1
14	nozzle-to-vessel	B3.150	1
15	nozzle-to-vessel	B3.150	1
16	nozzle-to-vessel	B3.150	1
17	nozzle-to-vessel	B3.150	1
18	nozzle-to-vessel	B3.150	1
13NIR	nozzle inside radius	B3.160	1
14NIR	nozzle inside radius	B3.160	1
15NIR	nozzle inside radius	B3.160	1
16NIR	nozzle inside radius	B3.160	1
17NIR	nozzle inside radius	B3.160	1
18NIR	nozzle inside radius	B3.160	1
19	terminal end weld	B9.21	1
20	terminal end weld	B9.21	1
21	terminal end weld	B9.21	1
22	terminal end weld	B9.21	1
WS-1	welded attachment	B8.40	1
WS-2	welded attachment	B8.40	1
WS-3	welded attachment	B8.40	1
WS-4	welded attachment	B8.40	1
WS-5	welded attachment	B8.40	1
WS-6	welded attachment	B8.40	1
1	circumferential head	C1.20	2
3	circumferential head	C1.20	2
3	circumferential head	C1.20	2
7	tubesheet-to-shell	C1.30	2
9	tubesheet-to-shell	C1.30	2 2 2 2 2
11	tubesheet-to-shell	C1.30	2

I. IDENTIFICATION OF COMPONENTS (Continued):

Welds/Components	Description	Code Item#	Class	- 1
	(Drawing 12050-WMKS	S-0111ST)		
1A	terminal end weld	B9.21	1	
	(Drawing 12050-WMK	S-0111Z)		
46	terminal end weld	B9.21	1	

II. IMPRACTICAL CODE REQUIREMENTS

Examination Categories B-B, B-D (Inspection Program B), B-H, B-J, and C-A require that volumetric and surface examinations be performed as indicated by the Code item numbers above.

UNIT 2 RELIEF REQUEST NDE-18 Continued:

III. BASIS FOR RELIEF

The regenerative heat exchanger (2-CH-E-3) provides preheat for the normal charging water going into the Reactor Coolant System (RCS). The preheat is derived from normal letdown water coming from the RCS. Charging and letdown constitute the normal chemical and volume control within the RCS. The heat exchanger itself is actually three heat exchangers in series interconnected with piping. This fact was previously utilized in limiting examinations to one of the heat exchangers as allowed by the Code. The heat exchanger has an outside shell diameter of 9.55 inches. The shells were manufactured with ASTM A351 CF8 type material. The heads were manufactured with ASTM A240 TP304 material. The 3 inch nozzle necks were manufactured with ASTM A182 F304 material. Until very recently the regenerative heat exchanger was entirely classified ASME Class 2 for inservice inspection activities. However, a reanalysis changed the classification of the letdown side of the heat exchanger to ASME Class 1. This action significantly increases the examination requirements associated with this heat exchanger. Nozzles which were previously exempt under Class 2 requirements are now required to be examined. Additionally all Class 1 nozzles are required to be examined, and the examinations are not limited to one heat exchanger.

The nozzle-to-vessel welds and nozzle inside radius sections for this vessel were not designed for ultrasonic examination from the outside diameter of the vessel. The small diameter of the vessel and nozzles along with the cast stainless steel vessel shell prevents a meaningful ultrasonic examination of these components.

The volumetric examination on the vessel head circumferential welds as required by the Code is limited due to the weld crown, radius of the closure caps, and the nozzles. The Code required volumetric examination of the tubesheet welds is limited by the weld crown and is obstructed by a support clamp. This clamp must be mechanically removed prior to the welds' examination. Additionally weld 12 is partially obscured by the six integral attachments which are themselves butted up against a clamp. It is estimated that between 21 and 42 percent of the circumferential welds could be examined, and 42 percent of the tubesheet welds could be examined, if the clamps are removed. Weld 12 would be significantly less due to the integral attachment location. Previous partial examinations completed on these welds have identified no problems.

An ALARA evaluation has been conducted on each activity associated with these examinations. A table is provided documenting these results. It is estimated that more than 32 man-rem will be required to complete these examinations over the interval. This estimate assumes optimum inspection and preparation times. If difficulties are encountered, a corresponding increase in dose would be expected. Shielding is not considered practical since the source of radiation is the component receiving the examinations. Considering the examination limitations previously discussed, expending this much dose is deemed impractical.

This relief request was originally submitted by letter Serial No. 93-018, dated February 16, 1993. The relief was granted ("provided that the lower regenerative heat exchanger receives the Code-required examinations to the extent possible") by letter dated August 7, 1995, and its associated safety evaluation report. This request is being revised to add four of six terminal end piping-to-vessel welds which are required to be selected for examination under Category B-J note 1(a) under item B9.21. These welds were omitted from the original request and need to be addressed in this relief request in addition to those already evaluated. New survey maps of the regenerative heat exchanger indicate higher dose rates than previously estimated (survey attached). Performing these surface examinations would result in approximately 10.5 man-rem of exposure and would negate, to a large degree, the exposure reduction of the original relief request. This is due to the close proximity of the regenerative heat exchanger to these welds and the need for scaffolding and insulation removal, which were previously eliminated for the regenerative heat exchanger in our original relief request.

UNIT 2 RELIEF REQUEST NDE-18 Continued:

IV. ALTERNATE REQUIREMENTS

Technical Specifications require that the RCS Leak Rate be limited to 1 gallon per minute unidentified leakage. This value is calculated every 72 hours in accordance with Technical Specification requirements. Additionally, the containment atmosphere particulate radioactivity is monitored every 12 hours per Technical Specification requirements. As a result, new leakage is rapidly identified and located during operation. Leakage identified from these components can be easily isolated by two upstream valves with manual operation from within the control room. The valves also receive an automatic control signal to close on inventory loss based on pressurizer level. However, these valves could not be used as the Class 1 boundary valves due to their nonsafety-related actuation. Correspondingly, as a result of the reclassification to Class 1, these components will receive a system leakage test prior to start up after each refueling outage. During this system leakage test the components will receive a visual (VT-2) examination. The support structures will receive a visual (VT-3) examination to the extent required by the Code without insulation removal.

Your evaluation of our original relief request, dated August 7, 1995, added alternative requirements. The appropriate portion of the Technical Evaluation Report states:

The licensee stated that previous partial examinationshave been completed on these welds. Consequently, it is concluded that a best-effort volumetric examination of the lower RHX, in addition to system radiation monitoring and the Code-required visual examinations, would provide reasonable assurance of the system's inservice structural integrity. Therefore, it is recommended that relief be granted, pursuant to 10 CFR 50.55a(g)(6)(i), provided the lower RHX vessel receives Code-required volumetric examinations to the extent possible.

We also request that this philosophy of inspection be extended to the vessel-topiping terminal end welds on the regenerative heat exchanger (RHX). The two lower RHX vessel-to-piping terminal end welds (22 & 46) will be examined by the surface method as required by the Code.

2-CH-E-3 EXAMINATIONS MAN-REM ESTIMATE

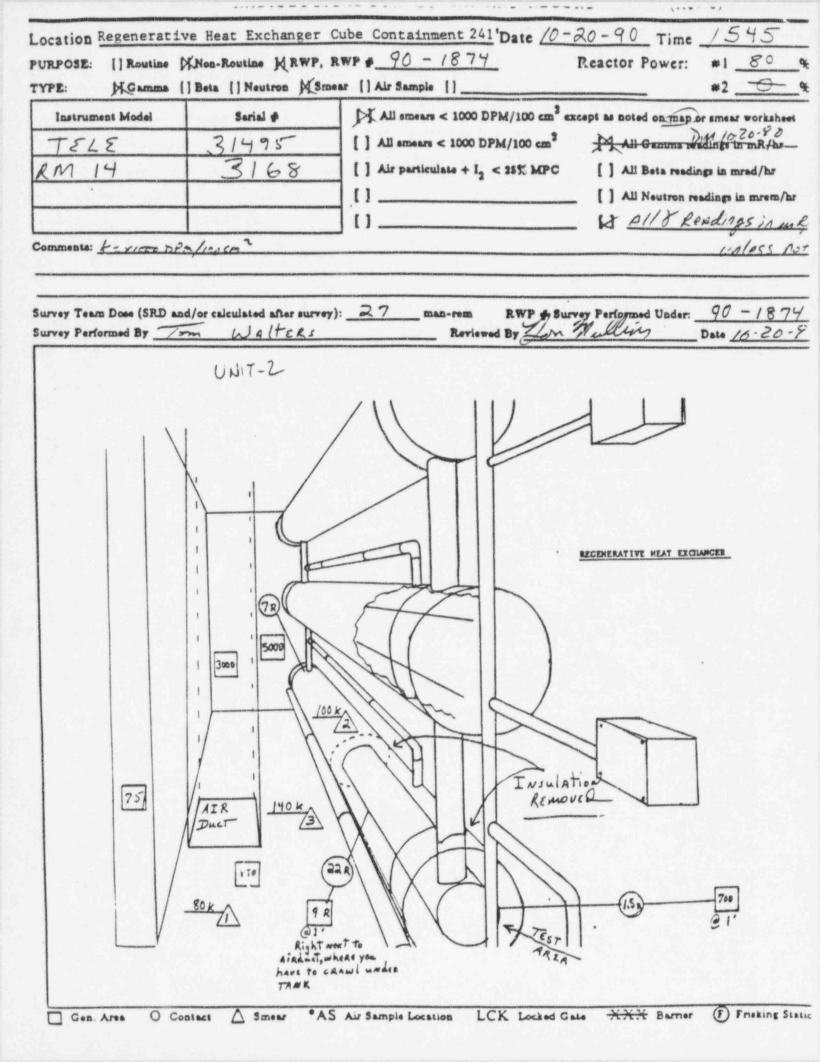
Work Task	Man-Hours (hrs)	Dose Rate (R/hr)	Man-Rem
Insulation Remove/Install	5.3	0.500	2.650
Scaffolding Install/Remove	0.0	0.000	0.000
Clamp Remove/Install	2.0	1.000	2.000
Weld Prep.	3.5	1.000	3.500
HP Coverage	36.0	0.010	0.360
Nozzle-to-Vessel Inspection (UT)	8.1	1.000	8.100
Nozzle Inside Rad Inspection (UT)	ius 6.6	1.000	6.600
Circumferential/Tu Inspection (UT)	besheet 5.3	1.000	5.300
Welded Attachmer Inspection (PT)	3.0	1.000	3.000
		Total Estimate	= 32.305

NORTH ANNA UNIT 2 2-CH-E-3 PIPING TERMINAL ENDS EXAMINATIONS MAN-REM ESTIMATE

6 Terminal End Welds

Work Task	Man-Hours (hrs)	Dose Rate (R/hr)	Man-Rem
Insulation Remove/Install	2.0	2.000	4.0
Scaffolding Install/Remove	1.0	1.500	1.5
Weld Prep.	1.0	2.000	2.0
PT Exam 6 Welds	1.5	2.000	3.0
		Total Estimate	= 10.5

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WZ: W8PM ISI-NDE&ENG PROG

JOB MAN-REM PROJECTION DATE: 12/04/92

ALARA EVALUATION NUMBER:

UNIT# 2

JOB DESCRIPTION: ISI/NDE REGEN HEAT EXCHANGER INSPECTIONS

TASK	WORK GROUP	MAN HOURS	DOSE RATE	MAN-REM/ WORKGROUP	TASK TOTAL
TOP Hx:	ISI/NDE				
- UT (2) NOZ TO VESSEL WELDS		2.7	1.000	2.700	
- UT (2) INNER RADIUS WELDS		2.2	1.000	2.200	
MID Hx:					
- UT (2) NOZ TO VESSEL WELDS		2.7	1.000	2.700	
- UT (2) INNER RADIUS WELDS		2.2	1.000		
ВОТТОМ Нх:					
- UT (2) NOZ TO VESSEL WELDS		2.7	1.000	2.700	
- UT (2) INNER RADIUS WELDS		2.2	1.000	2.200	
- UT (4) CIRCUMFERENTIAL WEL	.DS	5.3	1.000	5.300	
- PT (6) WELDED ATTACHMENT I	LUGS	3.0	1.000	3.000	23.000
SUPPORT ACTIVITIES:					
- INSUL. RMVL/INSTALL	INSUL.	5.3	0.650	3.445	
 SCAFFOLDING INSTALL/RMVL 	CARP.	0.0	0.000	0.000	
- WELD PREP	PF	3.5	1.000	3.500	
- HP COVERAGE	HP	36.0	0.010	0.360	
- (3) CLAMP RMVL/INSTALL	PF	2.0	1.000	2.000	9.305

NOTE: UT INSPECTION FOR CIRCUMFERENTIAL WELDS INCLUDE (3) PASSES: 0, 45, AND **60 DEGREES**

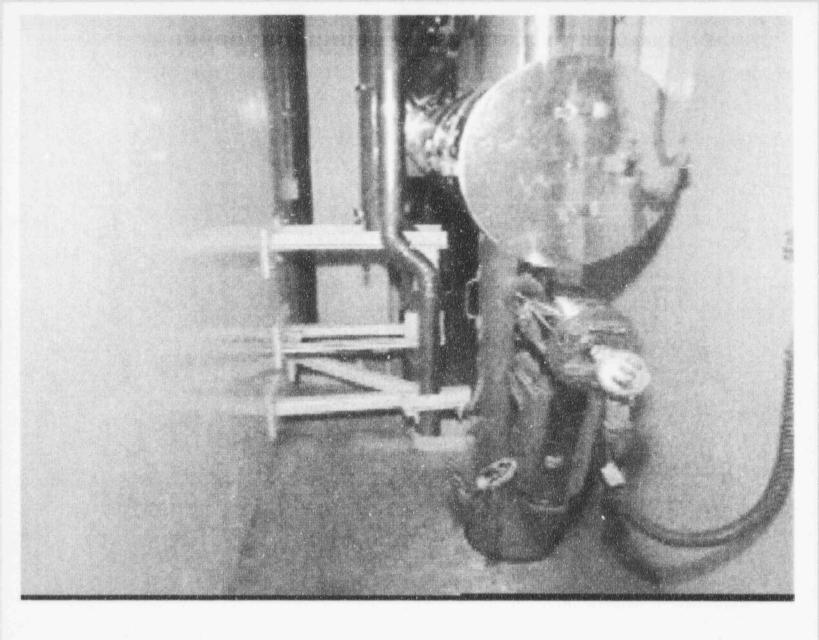
MAN-REM TOTAL

32.305 REM

MAN-HOUR TOTAL

70 HOURS

ALARA SIGNATURE



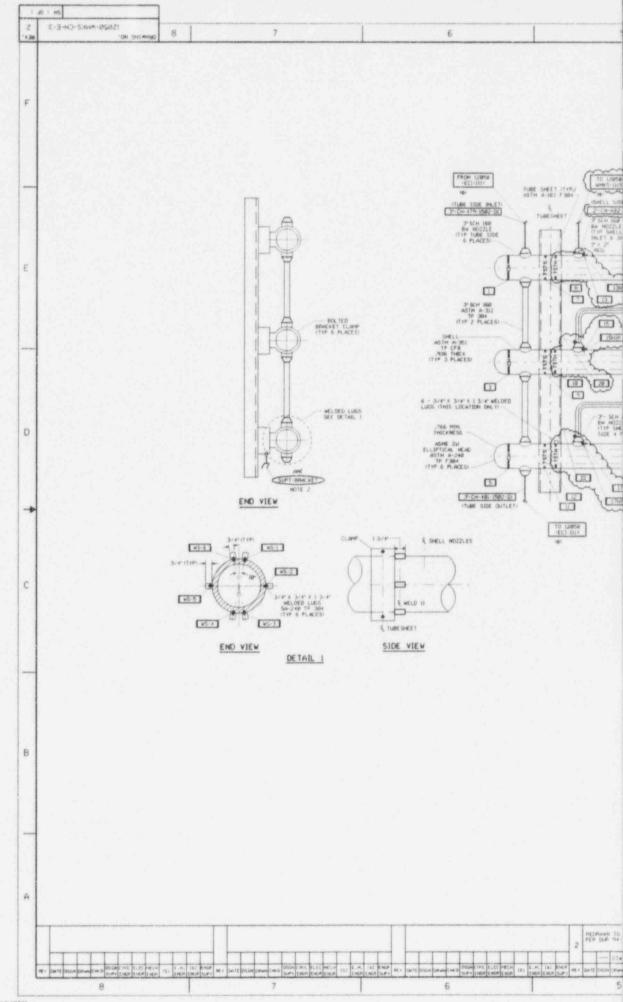
North Anna Unit 2 Regenerative Heat Exchanger lower shell - shell side inlet



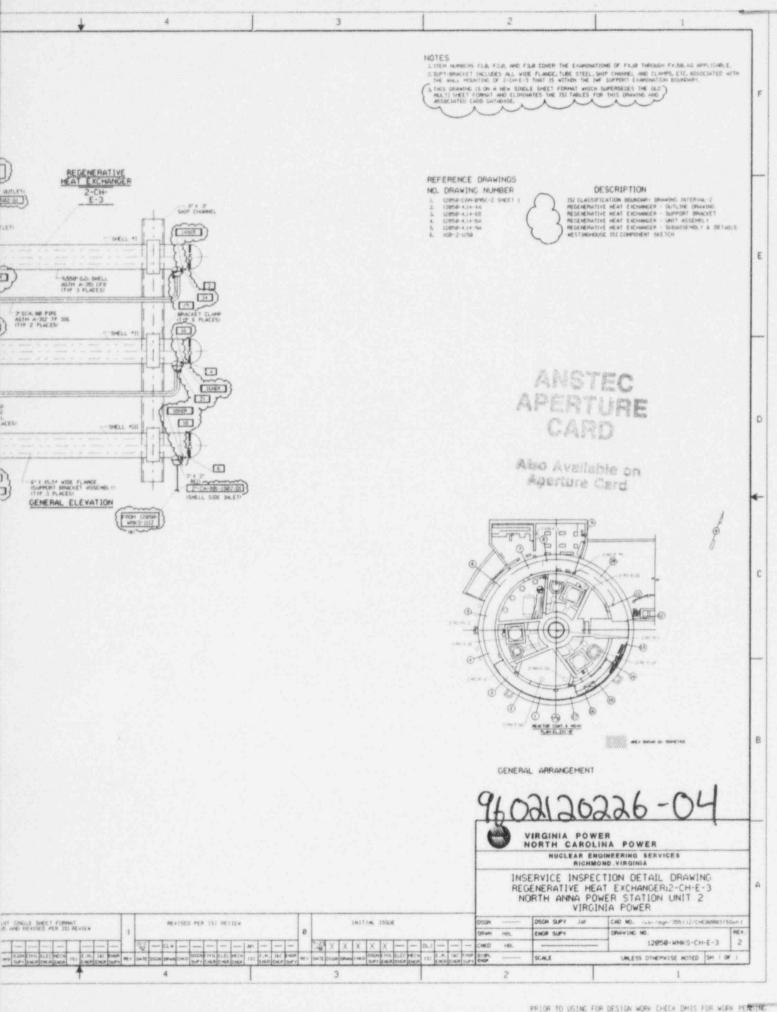
North Anna Unit 2 Regenerative Heat Exchanger lower and middle shells

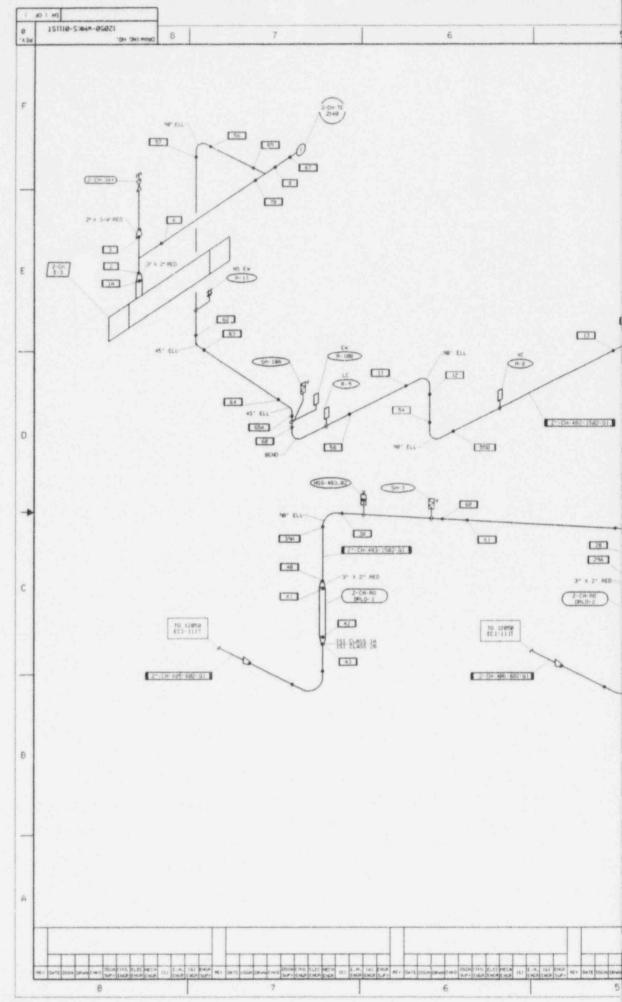


North Anna Unit 2 Regenerative Heat Exchanger middle and upper shells

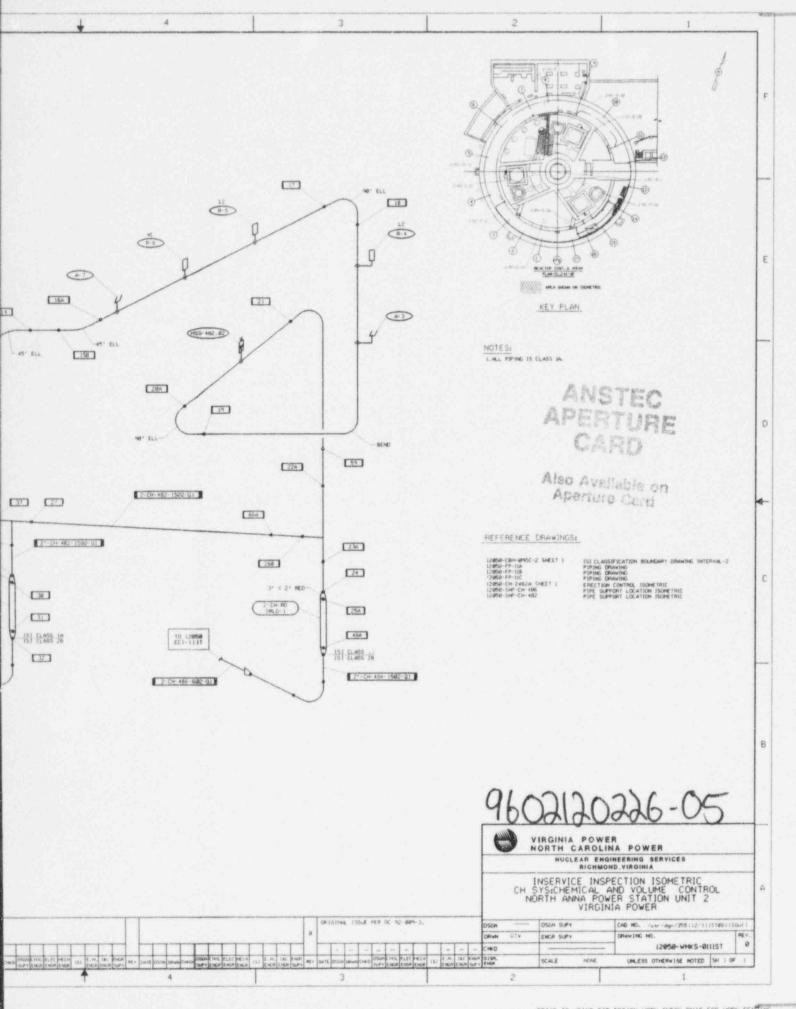


[W]_MERG] 11-Jun-1996 | 11-46 | war nager 355 | 12-7046 988933 | 50ak |





[WILMERG] 11-Jan-1990 |) +45 -us--age/355112/1115180:150e/1



9 21119-5364N-95921 6 [46] 6 [37] 45 2 . 3/4" RED 42 38 A R (<u>%</u>) 98" ELL 48 (39) -45" ELL 0 24 В 8 6

(w1LHERG) 11-JAN-1996 11:46 (war/dgn/355112/1112006(150bg)

Water Tales

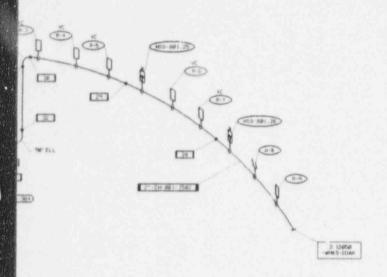
F

Ε

D

C

B



4



KEY PLAN

NOTES:

AMSTEC APERTURE CARD

Also Available on Aperture Card

REFERENCE DRAWINGS: 12050 CBH-095C-2 SHEET 1 12050 CH-0400, Hard 12050-CH-0460A SHEET 1

ISI CLASSIFICATION BOUNDARY IRRAVING INTERVAL-2 PIPING CHAMING. ERECTION CONTROL ISOMETRIC



VIRGINIA POWER

NUCLEAR ENGINEERING SERVICES RICHMOND VIRGINIA

INSERVICE INSPECTION ISOMETRIC CH SYSILETDOWN TO 2-CH-E-3 NORTH ANNA POWER STATION UNIT 2 VIRGINIA POWER

ENGR SUP