

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

March 3, 1988

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

Serial No. 88-033
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Docket No. 50-338
License No. NPF-4

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1
INTERVAL DATE CHANGE FOR ASME SECTION XI
INSERVICE TESTING PROGRAMS FOR PUMPS AND VALVES
REQUEST FOR EXEMPTION

The North Anna Unit 1 Inservice Testing Program for Pumps and Valves, second inspection interval, is due to be implemented on June 6, 1988 and would be in accordance with ASME Boiler and Pressure Vessel Code Section XI, 1983 Edition, Summer 1983 Addenda. In accordance with 10 CFR 50.55a(g)(4)(ii), we are required to perform inservice tests of pumps and valves in successive 120-month intervals beginning with the completion of the initial 120-month inspection interval.

10 CFR 50.12(a)(2)(ii) states in part that the NRC will consider granting an exception whenever application of the regulation is not necessary to achieve the underlying purpose of the rule. Accordingly, pursuant to 10 CFR 50.12(a)(2)(ii), we request an exemption from 10 CFR 50.55a(g)(4)(ii) to extend the current North Anna Unit 1 120-month inspection interval to December 14, 1990 for Inservice Testing of Pumps and Valves. Approval of this exemption would result in changing the second inspection interval start date for the North Anna Unit 1 Inservice Testing Program for Pumps and Valves to coincide with the second inspection interval start date for the North Anna Unit 2 Inservice Testing Program for Pumps and Valves. Since the North Anna Unit 1 testing program for the first inspection interval will remain in effect until that date, the underlying purpose of 10 CFR 50.55a(g)(4)(ii) will continue to be achieved.

Many advantages will be realized if the Unit 1 submittal and interval date is extended to coincide with the corresponding Unit 2 dates. Subsequent to the submittals for both Units in 1990, the Inservice Testing Programs for Units 1 and 2 would be on the same inspection interval and to the same code and

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addenda. Therefore, the testing requirements and future correspondence would be very similar for the two units. This will simplify our program preparation, review, and administration, as well as the program review by the NRC. Any relief requests submitted during the second inspection interval would be similarly affected. Identical submittal dates will further simplify program administration by Virginia Electric and Power Company and program review by the NRC because a single submittal would be made for both units.

Note also that by December 14, 1989, twelve months prior to the beginning of the second inspection interval for Unit 2, new testing standards, OM-6, "An American National Standard for Inservice Testing of Pumps," and OM-10, "An American National Standard for Inservice Testing of Valves," will most likely be required. Both standards have been approved by the Operations and Maintenance (O&M) main committee and are being finalized by the working subcommittees. These standards represent current industry practices relative to pump and valve testing and will enhance the effectiveness of the testing programs. A change in the interval dates for Unit 1 would facilitate incorporating this new technology into the programs for both Units at the start of the second interval.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action

10 CFR 50.55a(g)(4) requires that licenses update their inservice inspection (ISI) and testing (IST) programs to a newer edition of Section XI of the ASME Code each ten years. Since the regulations require these updates based on the 10-year anniversary of facility commercial operation, multi-unit sites often find that each unit has an IST program structured to a slightly different edition of the Code. Approval of this exemption request would allow a common start date for the IST program for North Anna Units 1 and 2. A common start date would be achieved by extending the present Unit 1 program expiration date from June 6, 1988 to December 14, 1990.

The Need for the Proposed Action

The requested exemption is needed because the IST program at North Anna would be accomplished for some period of time to two different ASME Codes if a common start date were not established. Although administratively possible, this situation could contribute to increased administrative overhead in the performance of inspection and testing requirements to two different versions of the Code. This will create an additional administrative workload for what can be described as only nominal technical differences in the inspection and testing requirements.

Environmental Impact of the Proposed Action

The proposed exemption would provide a degree of IST that is equivalent to that required by 10 CFR 50.55a(g)(4) such that there would be no increase in the risk of failure for operational readiness of pumps and valves

whose function is required for safety at these facilities. Consequently, the probability of failure for operational readiness of components would not be increased, the radiological risk would not be greater than determined previously, and the requested exemption would not otherwise affect plant radiological effluents. Therefore, we conclude that there are no significant radiological environmental impacts associated with this proposed exemption.

With regard to potential nonradiological impacts, the proposed exemption involves features located entirely within the restricted area as defined in 10 CFR Part 20. It would not affect plant nonradiological effluents and would have no other environmental impact. Therefore, we conclude that there are no significant nonradiological environmental impacts associated with the proposed exemption.

Alternative Use of Resources

This action does not involve the use of resources not previously considered in connection with the "Final Environmental Statement Relating to Operation of North Anna Nuclear Power Plant Units 1 and 2."

Finding of No Significant Impact

We conclude that an environmental impact statement for the proposed exemption is unnecessary. Based upon the foregoing environmental assessment, we have concluded that approval of the proposed action will not have a significant effect on the quality of the human environment.

As we are presently preparing the second interval program submittal for Unit 1 based on a start date of June 6, 1988, we request a response to this exemption request as soon as possible.

In compliance with 10 CFR 170.21, a check in the amount of \$150.00 is attached.

If you require additional information, please contact us.

Very truly yours,



W. L. Stewart

Attachment

cc: U. S. Nuclear Regulatory Commission
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Mr. J. L. Caldwell
NRC Senior Resident Inspector
North Anna Power Station