



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 24, 1997

Mr. J. P. O'Hanlon
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

SUBJECT: NORTH ANNA POWER STATION UNIT 1 AND UNIT 2 - ASME SECTION XI RELIEF
REQUEST NDE-32 - SERVICE WATER SYSTEM (SWS) LEAKS
(TAC NOS. M98278 AND M98279)

Dear Mr. O'Hanlon:

The NRC staff has evaluated the information provided in your submittal dated February 24, 1997, the response of August 8, 1997, to our Request for Additional Information (RAI), and your letter dated November 24, 1997, summarizing the implementation requirements, related to the inservice inspection program relief request NDE-32.

Based on the evaluation of relief request NDE-32, it is concluded that the performance of an immediate Code repair after each and every newly discovered flaw caused by microbiologically induced corrosion (MIC) would have constituted an undue burden (create undue hardship) upon Virginia Electric and Power Company since the repair may exceed the time limits imposed by the governing Technical Specification. This would necessitate the isolation of portions of the SWS that are otherwise structurally sound and capable of performing their intended safety function. Isolating portions of the SWS to perform a Code repair is not in the best interest of plant safety, given the magnitude of the flaw and your alternative program.

Your alternative program for this period includes evaluation of the flaws consistent with the guidelines and acceptance criteria of Generic Letter (GL) 90-05. Upon discovery, each flaw detected will be documented in the corrective action system by deviation report. Identification of a structurally inadequate weld will result in associated piping to be declared inoperable and an appropriate Technical Specification action statement to be taken. The through-wall flaws and leakage rates will be monitored. An augmented inspection program will be performed on a quarterly basis on a sample of a minimum of 10 welds in the SWS for augmented radiographic inspections. You have further stated that all the flaws will be repaired within 18 months from the day of the identification of the flaws and the documentation of the SWS inspection, monitoring program and repair of identified flaws will be maintained on site, available for inspector review, and in accordance with the quality records retention requirements. This alternative to the Code requirement will be followed for the remainder of the second 10-year inspection interval. The Unit 1 second 10-year interval will end on December 24, 1998, and the Unit 2 second 10-year interval will end on December 14, 2000. The staff finds the structural integrity and operability assessments as well as the proposed actions to meet the Code requirements to be acceptable and this request to be reasonable.



While the impracticality of the Code requirements was not shown, the staff finds that relief may be granted pursuant to 10 CFR 50.55a(a)(3)(ii) because compliance with the requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The staff's evaluation and conclusions are contained in the Enclosure.

The staff has completed its evaluation of this matter and we are, therefore, closing out TAC Nos. M98278 and M98279.

Sincerely,

(Original Signed By)

James E. Lyons, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosure: As stated

cc w/encl: See next page

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11/10

Mr. J. P. O'Hanlon
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