

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

November 2, 1999

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

Serial No. 99-552  
NL&OS/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 AND 2**  
**ASME SECTION XI INSERVICE INSPECTION PROGRAM**  
**DELAY THIRD INTERVAL PROGRAM IMPLEMENTATION**

On September 22, 1999, the NRC published in the Federal Register a final rule, which among other actions, changed the ASME Section XI inservice inspection (ISI) code to the 1995 Edition through the 1996 Addenda for ISI activities related to components and supports, and added the 1995 Edition and 1996 Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants for the inservice testing (IST) of pumps and valves. The effect of the rulemaking is to require utility ISI program updates to these code dates in accordance with the update requirements of 10 CFR 50.55a. The final rule, published on September 22, 1999, did not include a proposed initiative to eliminate the requirement for the 120-month update and establish the associated baseline edition of the ASME Code. It is our understanding that this initiative is nearing completion and the NRC may likely decide in favor of eliminating the 120-month update. This presents a dilemma in timing ISI/IST update submittals for North Anna Power Station. Therefore, in accordance with 10 CFR 50.55a(3)(i), Virginia Power requests an alternative to the ISI and IST program update and implementation requirements of 10 CFR 50.55a(f)(4)(ii) and (g)(4)(ii) based on the following discussion.

Based on our current program update schedules and the September 22, 1999 final rule, North Anna Power Station is required to update the ISI program for Unit 2 and the IST program for pumps and valves for both Units 1 and 2 in accordance with the above requirements and implement the programs effective December 15, 2000. Work needs to begin in the very near future to develop the new inspecting and testing programs and be completed in the late spring of 2000 to support June 2000 submittals to the NRC staff. Submittal by June 2000 provides NRC review time to address any request for relief from code requirements associated with the new programs. The timing is particularly important for the IST programs, as testing would begin to the new code date on or about December 15, 2000.

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It is our understanding that a decision on eliminating the 120-month update requirement may occur within the next year and that the 1989 ASME Code may be specified as the baseline edition. This would render our current effort to upgrade ISI/IST programs as premature and the associated expenditure of resources unnecessary (i.e., updating the ISI and IST programs to the 1995 ASME Code is estimated to cost over \$300,000 in resources). Alternatively, Virginia Power cannot simply wait for the resolution of the 120-month update criteria and still have adequate time to comply with the September 22, 1999 rulemaking if the NRC decides against the action. Therefore, Virginia Power proposes an alternative to the requirements for update by December 15, 2000. It is requested that the North Anna Power Station Unit 2 ISI program and the IST programs for both North Anna Power Station Units 1 and 2 be permitted to delay the program updates and to start the third intervals on the same code dates they finish the second intervals – 1986 Edition for the Unit 2 ISI program and the 1989 Edition for the IST programs for Units 1 and 2. This alternative would be effective for one year.

The final nine years of the third interval, beginning December 15, 2001, will meet the requirements of 10 CFR 50.55a in effect on December 15, 2000. This delay should allow sufficient time for the resolution of the 120-month ISI and IST program update issue. Since the rulemaking of September 22, 1999 does not generically require an immediate update of ISI and IST programs to the newly approved codes unless otherwise required by plant specific program update schedules, we conclude that there are no immediate safety issues associated with the general update. Because the NRC is allowing other licensees to remain on their current code dates until their 120-month anniversary is reached, we conclude the current code dates provide an acceptable level of quality and safety for the immediate future. Therefore, we conclude the requirements of 10 CFR 50.55a(a)(3)(i) have been satisfied and request the Director of the Office of Nuclear Reactor Regulation approve this alternative.

This alternative request is applicable only to the program update requirements of 10 CFR 50.55a paragraphs (f)(4)(ii) and (g)(4)(ii) and does not delay the implementation of any other requirements of the September 22, 1999 rulemaking. This alternative has been reviewed and approved by the Station Nuclear Safety and Operating Committee.

There are no new commitments made in this letter. If you have questions concerning these requests, please contact us.

Very truly yours,



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