

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 10, 1999

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

Serial No. 99-518
NL&OS/GDM R0
Docket No. 50-281
License No. DPR-37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNIT 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
RISK-INFORMED INSERVICE INSPECTION

Virginia Electric and Power Company is currently developing a Class 1 Risk Informed Inservice Inspection (RI-ISI) Program for Surry Unit 2 using Westinghouse Topical Report, WCAP-14572 Revision 1-NP-A. Submission of the new program for NRC review is currently planned for April 2000. Surry Unit 2 is presently in the second period, third interval, of the ASME Section XI (1989 Edition) Inservice Inspection Program.

The NRC previously published Information Notice (IN) 98-44, "Ten-Year Inservice Inspection (ISI) Program Update for Licensees That Intend to Implement Risk-Informed ISI of Piping." This document states that "...the staff will consider authorizing a delay up to 2 years in implementation of the next 10-year ISI program for piping only to allow licensees to develop and obtain approval for their RI-ISI program at the next available opportunity using the staff-approved topical reports." We previously requested a delay for the implementation of the North Anna Unit 1 ASME Section XI third inspection interval and development of a RI-ISI program, and received NRC approval on May 10, 1999. The approval was based on the provisions of 10 CFR 50.55a(a)(3)(ii) because compliance with the requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Although, IN 98-44 does not address programs that may choose to implement a RI-ISI program mid-interval, Surry Unit 2 will be likewise confronted with a similar hardship and difficulty, since it will be submitting an ASME Class 1 RI-ISI Program mid-interval.

As noted above, Surry Unit 2 is in the second period of its third ASME Section XI inspection interval. Surry Unit 2 has one refueling outage remaining in the second period of the third interval currently scheduled for October 2000. Approximately 76 welds are scheduled to be examined to the requirements of Category B-F and B-J of ASME Section XI (1989 Edition) during the outage to complete the second period

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requirements under the current program. The inspection includes volumetric and surface examinations as required by the Code at these locations. Approximately 97 locations were inspected in the first period and 35 locations in the second period. In contrast, the RI-ISI program for Surry Unit 1 requires only 68 Class 1 locations to be examined (volumetric, surface, visual VT-2) over the entire ten-year interval.

Based on the RI-ISI program results previously implemented for Surry Unit 1, performing further examinations under the current ASME Section XI Category B-F and B-J requirements at Surry Unit 2 during the Fall 2000 refueling outage would result in unnecessary personnel exposure since the inspection sample already performed exceeds the sample that would likely be required by implementation of a RI-ISI program. Furthermore, the intent and provisions established in IN 98-44 allow for delays in performing currently required ISI inspections by recognizing that many inspections will be eliminated by implementing a RI-ISI program. Alternatively, it is proposed that the RI-ISI program that will be submitted for Surry Unit 2 by April 2000 be implemented in the third period of the third inspection interval with approximately one third of the interval examinations being scheduled in that period. The first RI-ISI examinations would be performed in the first refueling outage of the third period, which is currently scheduled for April 7, 2002. Other Code requirements (e.g., Class 2 and 3 inspections, pressure testing, repairs and replacements, etc.) would be conducted as required.

Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), Virginia Electric and Power Company requests that the Surry Unit 2 ISI program (NDE, Categories B-F and B-J) for the second period, third inspection interval, be suspended until the third period to permit the preparation, submittal and NRC review of a Surry Unit 2 RI-ISI program for Class 1 piping. The Surry Unit 2 RI-ISI program will be implemented in the third period, third inspection interval, as an alternative to current ASME Section XI requirements. This relief request for Surry Unit 2 has been reviewed and approved by the Station Nuclear Safety and Operating Committee.

If you have any questions or require additional information, please contact us.

Very truly yours,



Leslie N. Hartz
Vice President - Nuclear Engineering and Services

Commitment made in this letter:

A RI-ISI program will be submitted for Surry Unit 2 by April 2000.

cc: U. S. Nuclear Regulatory Commission
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