

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**RICHMOND, VIRGINIA 23261**

January 2, 2002

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

Serial No.: 01-744  
NL&OS/GDM: R0  
Docket No.: 50-280  
50-281  
License No.: DPR-32  
DPR-37

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**ASME SECTION XI INSERVICE TESTING PROGRAM**  
**RELIEF REQUESTS G-1**

Surry Power Station Units 1 and 2 are presently in their third ten-year inservice testing interval. Inservice tests on pumps and valves are conducted in accordance with the requirements of the 1989 Edition of the ASME Section XI Code. The 1989 Edition of the Code also specifies the duties of the Authorized Nuclear Inservice Inspector (ANII) pertaining to the inservice testing program. However, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector due to the minimal value added. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), Relief Requests G-1 for Surry Units 1 and 2 are attached hereto for your review and approval to eliminate the Code-specified requirements for ANII involvement in the inservice testing program for pumps and valves.

This request has been approved by the Surry Station Nuclear Safety and Operating Committee. If you have any questions or require additional information, please contact us.

Very truly yours,



L. N. Hartz  
Vice President- Nuclear Engineering and Services

Attachment

A047

Commitments contained in this letter:   None

cc:    U.S. Nuclear Regulatory Commission  
        Region II  
        Atlanta Federal Center  
        61 Forsyth St., SW, Suite 23T85  
        Atlanta, Georgia 30303

        Mr. R.A. Musser  
        NRC Senior Resident Inspector  
        Surry Power Station

        Robert Smith  
        Authorized Nuclear Inspector  
        Surry Power Station

**Attachment**

**Relief Requests G-1**  
**Surry Power Station Units 1 and 2**

**Dominion**

**RELIEF REQUEST G-1**  
**SURRY POWER STATION UNIT 1**

**I. Section XI Code Requirements For Which Relief Is Requested**

Section XI, IWA-2110, the 1989 Edition, details the duties of the inspector that pertain to inservice tests required on pumps and valves and component supports.

**II. Basis For Relief**

Section XI, IWA-2110, the 2000 Addenda to the 1998 Edition eliminates reference to inservice testing (IST) on pumps and valves as a duty of the inspector.

The Authorized Nuclear Inservice Inspector's (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of the ANII relative to the inservice test performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded. In general, ANIIs do not have the training or background experience to make determinations about component safety functions in order to verify program scope, or to assess the operational readiness of components based on test results. Consequently, the ANII review provides little benefit.

Surry has a multi-layered review process that performs the same functions as the ANII noted above but with individuals who have extensive experience in the Code-required testing of pumps and valves. Also, the IST Program is subject to the Surry Quality Assurance Program that provides an equivalent, or greater level of quality and safety than the requirements for ANII involvement specified in the Code. Therefore, there is no quality-related benefit in the ANII duplicating the review efforts performed by station personnel.

**III. Proposed Alternate Requirements**

The Code requirements specifying the duties of the ANII described in ASME Section XI, IWA-2110 will be eliminated from the IST Program.

The proposed alternative to the specific requirements of ASME Section XI, IWA-2110 identified above (i.e., a multi-layered review of the IST Program performed by experienced licensee personnel) will provide an acceptable level of quality and safety. Furthermore, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), we request relief from the specific IWA Code requirements identified in this relief request for Surry Unit 1.

## **RELIEF REQUEST G-1** **SURRY POWER STATION UNIT 2**

### **I. Section XI Code Requirements For Which Relief Is Requested**

Section XI, IWA-2110, the 1989 Edition, details the duties of the inspector that pertain to inservice tests required on pumps and valves.

### **II. Basis For Relief**

Section XI, IWA-2110, the 2000 Addenda to the 1998 Edition eliminates reference to inservice testing (IST) on pumps and valves as a duty of the inspector.

The Authorized Nuclear Inservice Inspector's (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of the ANII relative to the inservice test performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded. In general, ANIIs do not have the training or background experience to make determinations about component safety functions in order to verify program scope, or to assess the operational readiness of components based on test results. Consequently, the ANII review provides little benefit.

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The Code requirements specifying the duties of the ANII described in ASME Section XI, IWA-2110 will be eliminated from the IST Program.

The proposed alternative to the specific requirements of ASME Section XI, IWA-2110 identified above (i.e., a multi-layered review of the IST Program performed by experienced licensee personnel) will provide an acceptable level of quality and safety. Furthermore, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), we request relief from the specific IWA Code requirements identified in this relief request for Surry Unit 2.