

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

June 5, 2003

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

Serial No.: 03-235A  
NL&OS/ETS R0  
Docket Nos. 50-338, 339  
50-280, 281  
License Nos.: NPF-4, 7  
DPR-32, 37

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**SURRY POWER STATION UNITS 1 AND 2**  
**RISK-INFORMED ISI RELIEF REQUESTS R-1**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

In a letter dated June 13, 2002 (Serial No. 02-212), Virginia Electric and Power Company (Dominion) submitted Relief Request R-1 for Surry Unit 1 and revised Relief Requests R-1 for North Anna Units 1 and 2 and Surry Unit 2. These relief requests apply to socket-welded connections and their associated branch connections 2 inches and smaller nominal pipe size. The relief requests address the difficulty of performing volumetric examinations on these type of connections.

During staff review of the relief requests, the NRC requested additional information clarifying the performance of the examination of the socket-welded connections. A conference call was held on June 3, 2003, to discuss the staff questions. At the conclusion of the conference call, Dominion agreed to provide a written response to the NRC's questions. Our response is provided in the attachment.

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

Very truly yours,



Leslie N. Hartz  
Vice President – Nuclear Engineering

Attachment

Commitments made in this letter: None

A047

cc: U.S. Nuclear Regulatory Commission  
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**Attachment**

**Response to NRC Request for Additional Information  
Relief Requests R-1**

**North Anna Units 1 and 2  
Surry Units 1 and 2**

**Virginia Electric and Power Company  
(Dominion)**

**Attachment**

**Response to Request for Additional Information**  
**Relief Requests R-1**  
**North Anna and Surry Power Station Units 1 and 2**

**Dominion Clarification:**

In general, the VT-2 examination and pressure test required by relief request R-1 will conform to the requirements of ASME Section XI IWA-2000 & 5000 of the Edition and Addenda applicable to the station's Inservice Inspection (ISI) program. Additionally, NRC approved Code Case N-498-1 (or later revision as approved by the NRC) may be applied for the end of interval testing.

**NRC Question (1)**

**What hold times will be used?**

**Dominion Response (1)**

The requirements of ASME Section XI IWA-5000 or Code Case N-498-1 (or later NRC approved revision) will be followed as applicable for hold times. This response also comports with the latest NRC regulation on this subject found in 10 CFR50.55a(b)(2)(xix).

Specifically:

**Class 1 High Safety Significant (HSS) hold times**

Insulated components – 4 hours minimum at test pressure

Non-insulated components – 10 minutes minimum at test pressure

**Class 2 or 3 HSS (Surry Unit 1 only) hold times**

**Normally operating**

Insulated components – system operating for at least 4 hours

Non-insulated components – system operating for at least 10 minutes

**Normally standby (not operating)**

Insulated and non-insulated – 10 minutes minimum at test pressure

**NRC Question (2)**

**What pressure test requirements will be used?**

**Dominion Response (2)**

The requirements of IWA-5000 of ASME Section XI or ASME Code Case N-498-1 (or later NRC approved revision) shall be followed at nominal operating pressure in conjunction with a visual (VT-2) examination.

**NRC Question (3)**

**Will the test be done in accordance with ASME Code requirements?**

**Dominion Response (3)**

Yes, the test will be performed in accordance with ASME Section XI IWA-2000 and 5000, or Code Case N-498-1 (or later NRC approved revision), except test frequencies, which will be applied conservatively for Class 2 and 3 piping by testing on an every refueling outage basis. Additionally, the test would require nominal operating pressure even if the Code does not (e.g., Class 1 leakage test beyond first isolation valve).

**NRC Question (4)**

**Will the test be done in accordance with system leakage test, system functional test, hydrostatic test, and or system pressure test requirements?**

**Dominion Response (4)**

The appropriate pressure tests, as required by ASME Section XI IWA-5000 or Code Case N-498-1 (or later NRC approved revision), will be performed on these piping segments.