

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

December 9, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 680
NO/RT/WDC:acm
Docket No. 50-281
License No. DPR-37

Gentlemen:

Surry Power Station Unit 2 will be performing a repair within a system boundary designated as ASME Class 2 during the upcoming maintenance outage scheduled to begin December 7. Pursuant to 10 CFR 50.55a paragraph g(5), relief is requested from certain post repair test requirements delineated in ASME Section XI. The following basis is provided.

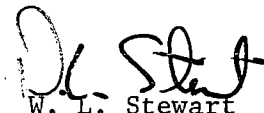
This relief is identical in nature to a previous relief request for replacement of a comparable valve on Surry Power Station Unit 1 (Serial No. 530, dated 9/15/82). A relief was granted for this replacement (dated 10/1/82).

Specifically it is planned to replace three 1 1/2 inch drain valves (2-MS-106, 2-MS-74, and 2-MS-268), which are just downstream of the main steam trip valves (drawing attached). The governing code ASME XI 77W78 requires a hydrostatic test for such a repair/replacement. As evidenced by the attached drawing this would require a hydrostatic test of the entire steam generator and a considerable portion of large main steam piping. Thus a hydrostatic test would be especially difficult and concomitantly impractical. Note also that ASME Section XI exempts 1 inch nominal and smaller from hydrostatic pressure tests.

Alternate testing proposed is liquid penetrant and visual examination supplemented by an inservice leakage test at hot shutdown which is 125% of normal operating pressure.

We contend that adequate basis for relief is presented above and that the proposed alternate testing provide adequate insurance of the integrity of the six 1 1/2" welds affected.

Very truly yours,

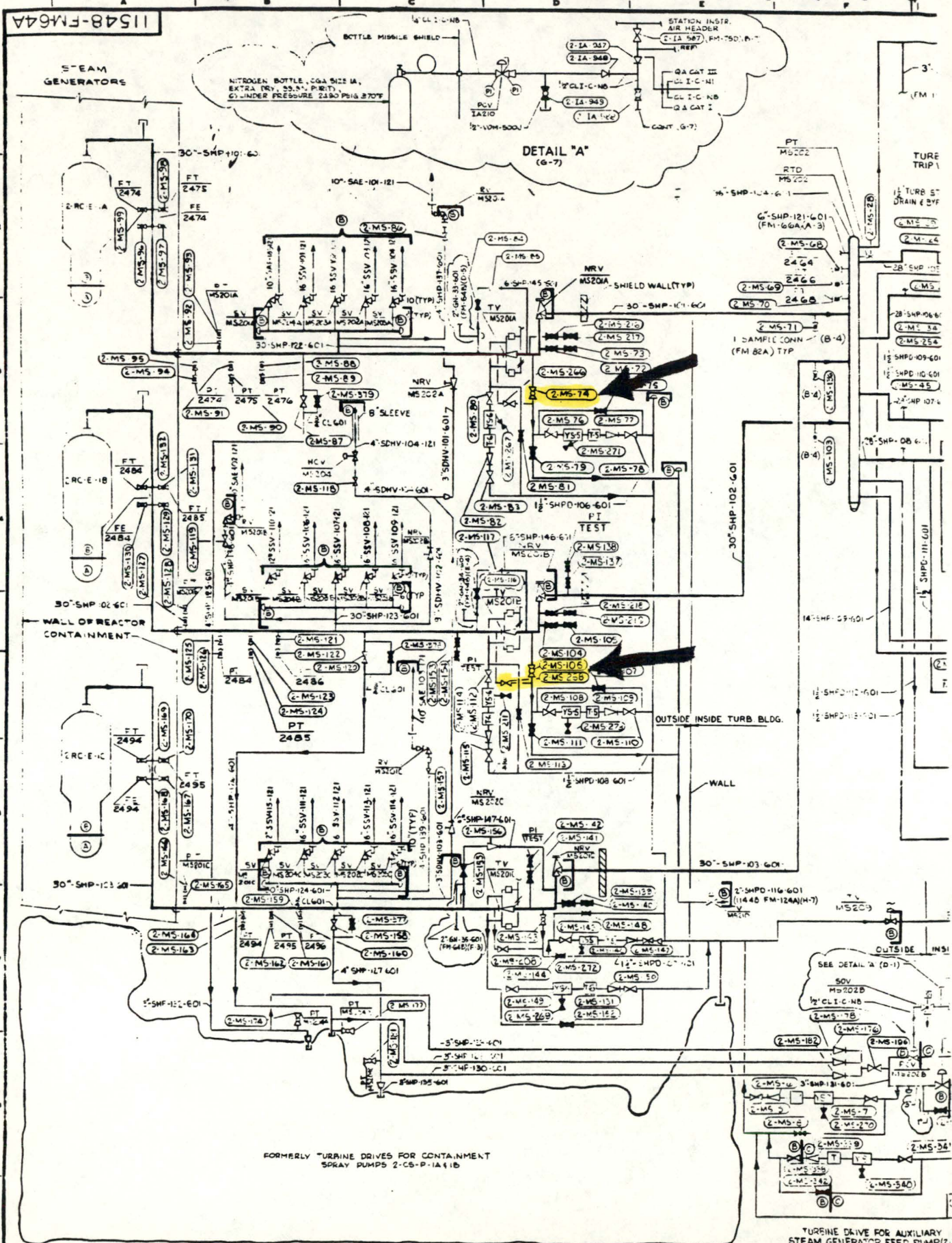

W. L. Stewart

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cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
Region II

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PDR ADOCK 05000281
P PDR

11548-FM64A



13		ADD: HP TURB SAMPLE COOLER (G-1) DC 74-103 1 CAP CONT SPRAY PUMP (G-7) DC 73-102		12		B-25-76		REMOVED 50 VENT VALVES (A-2, A-4, A-6)		AUG 2-3-76		4		ADDED VALVES, VALVE OPERATOR'S ROOM, VALVE OPERATOR'S ROOM, VALVES VALVE - PERIODS AND PIPING		CS		PT		13		ADDED 12 IN. DIA. TURBINE NUMBER 1 VALVE OPERATOR'S ROOM, VALVE OPERATOR'S ROOM	
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