

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

March 16, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. Steven A. Varga, Chief  
Operating Reactors Branch 1  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 143  
NO/WDC:acm  
Docket No. 50-280  
License No. DPR-32

Gentlemen:

RELIEF REQUEST FROM ASME XI HYDROSTATIC TEST  
SURRY POWER STATION UNIT 1

Surry Power Station Unit 1 will be performing a repair within a system boundary designated as ASME Class 2 during the refueling outage currently underway. 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.

Specifically it is planned to replace three 1 1/2 inch socket welded drain valves (1-MS-266, 1-MS-106, and 1-MS-143) and one 2 inch socket welded manual isolation valve (1-GN-3), which are just downstream of the main steam trip valves (drawings attached). The governing code ASME XI 80W80 requires a hydrostatic test (IWA 4400 and IWC-5222) for such a repair/replacement. As evidenced by the attached drawings this replacement would require a hydrostatic test of all three steam generators and a considerable portion of attached main steam piping. This test is considered especially difficult and impractical in nature.

Alternate testing proposed is a surface examination (liquid penetrant) and a visual examination (VT-2) in conjunction with a system inservice pressure test (IWC-5221) during start-up, following the refueling outage.

This relief is identical in nature to previous relief requests for replacements on Surry Power Station Unit 1 (Serial No. 530, dated 9/15/82) and on Surry Power Station Unit 2 (Serial No. 680, dated 12/9/82). Reliefs were granted for these replacements (dated 10/1/82 and 12/10/82).

It is our contention, that from the information provided, relief should be granted. Alternative testing proposed provides for the necessary inspection and integrity insurance for all affected welds.

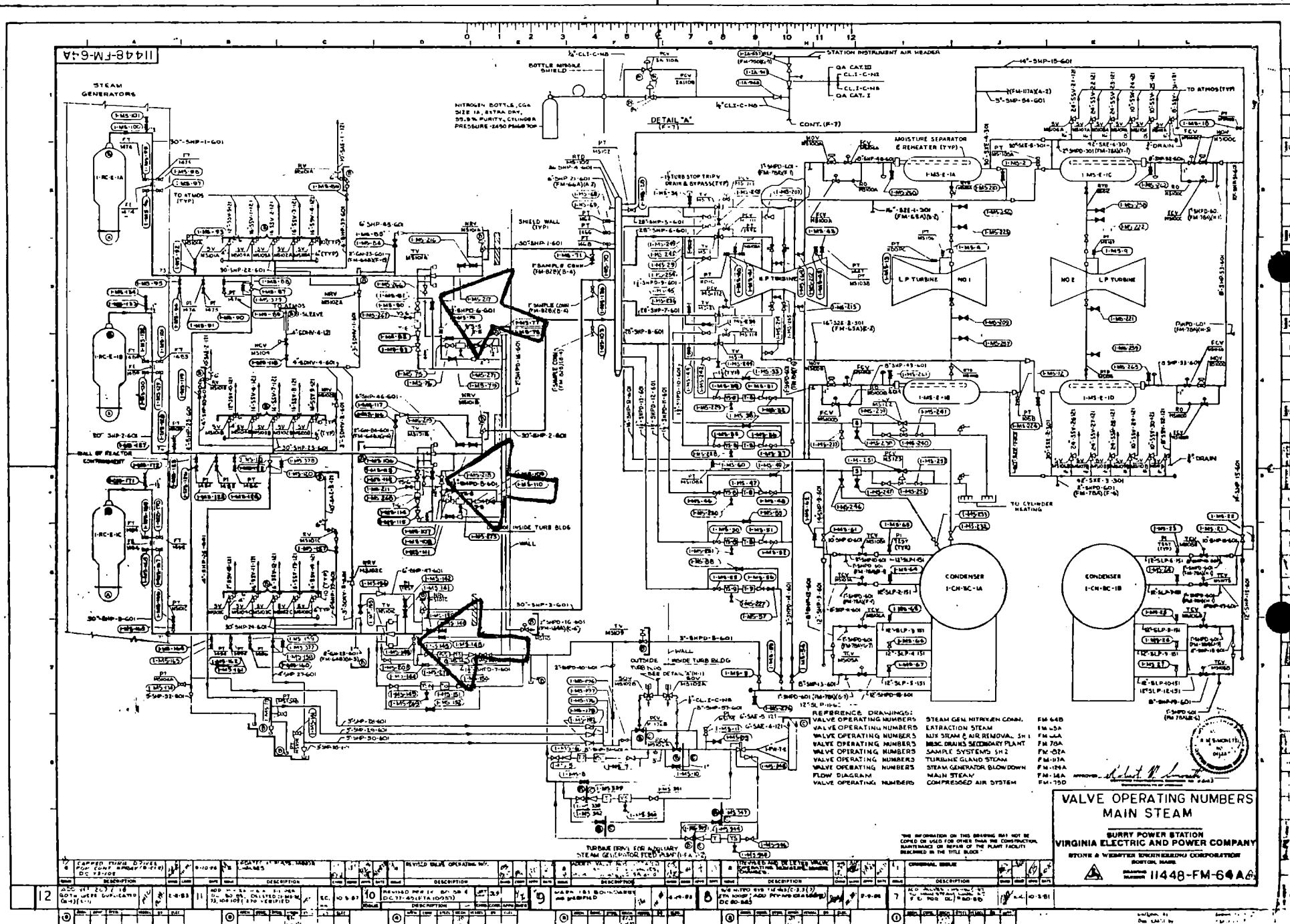
Very truly yours,

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PDR ADOCK 05000280  
P PDR

W. L. Stewart  
W. L. Stewart

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

Adm  
w/Check  
\$4,400



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77.1	49.2A
77.2	50.3A
77.3	6.2A
77.4	1.3B

V. E. P. C. O.

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