

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

April 12, 1984

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

Serial No. 201
NO/JDH:acm
Docket No. 50-281
License No. DPR-37

Gentlemen:

ASME XI RELIEF REQUEST
SURRY POWER STATION UNIT 2

Surry Power Station Unit 2 is performing several repair and replacement actions within systems designated ASME Class 2 during the scheduled maintenance outage which began on March 16, 1984. As discussed in our March 16 and 19 telecon between Mrs. W. D. Craft, Vepco, and Mr. J. D. Neighbors of your staff, and pursuant to 10 CFR 50.55a paragraph g(5), relief is requested from certain post repair/replacement test requirements delineated in ASME Section XI. The following bases are provided:

1. Due to check valve leakage three, 3 inch check valves, 2-FW-27, 58, and 89 (Attachment 1), are required to be removed and repaired utilizing the rules of IWA 4000, IWA 7000 and IWC 7000 of ASME Section XI, 1980 edition W 1980 addenda. This action as defined in IWA 5214 requires a hydrostatic pressure test in accordance with IWC 5222. As evidenced by the attached drawings, this hydrostatic test would include all three main steam generators and a significant portion of the attached feedwater and main steam piping. As this test is considered extremely difficult and impractical, alternative inspection is proposed.

Upon reinstallation of the attachment welds a surface examination (liquid penetrant) will be conducted. In addition, a radiographic examination will augment the post repair inspection in lieu of the required pressure test.

2. Due to internal leakage, a 1-1/2 inch manual isolation valve, 2-MS-74 (Attachment 2), requires replacement utilizing the rules of IWA 7000 and IWC 7000 of ASME Section XI, 1980 edition W 1980 addenda. This replacement as defined in IWA 5214 requires a hydrostatic pressure test in accordance with IWC 5222. This test, if conducted, would include within the hydrostatic test boundaries the 'A' main steam generator and a large portion of the associated piping. This test, as previously stated, is considered difficult and impractical. As a result, alternative inspection is proposed.

8404200197 840412
PDR ADOCK 05000281
P PDR

Rec'd w/ check \$4,000

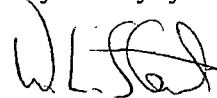
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VIRGINIA ELECTRIC AND POWER COMPANY TO Harold R. Denton

A surface examination (liquid penetrant) will be conducted on the attachment welds. In addition, a system pressure test (IWC 5221) in conjunction with a VT-2 examination will be substituted for the required hydrostatic test.

The proposed alternative examination provides the necessary inspection and integrity assurance intended by the code, allows a more practical approach to post repair/replacement inspection, and is in conformance with previous requests associated with steam generator problems. Based on the above, relief should be granted. A check for \$4000 in payment of the technical review fee is attached.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'W. L. Stewart', with a stylized, cursive-like script.

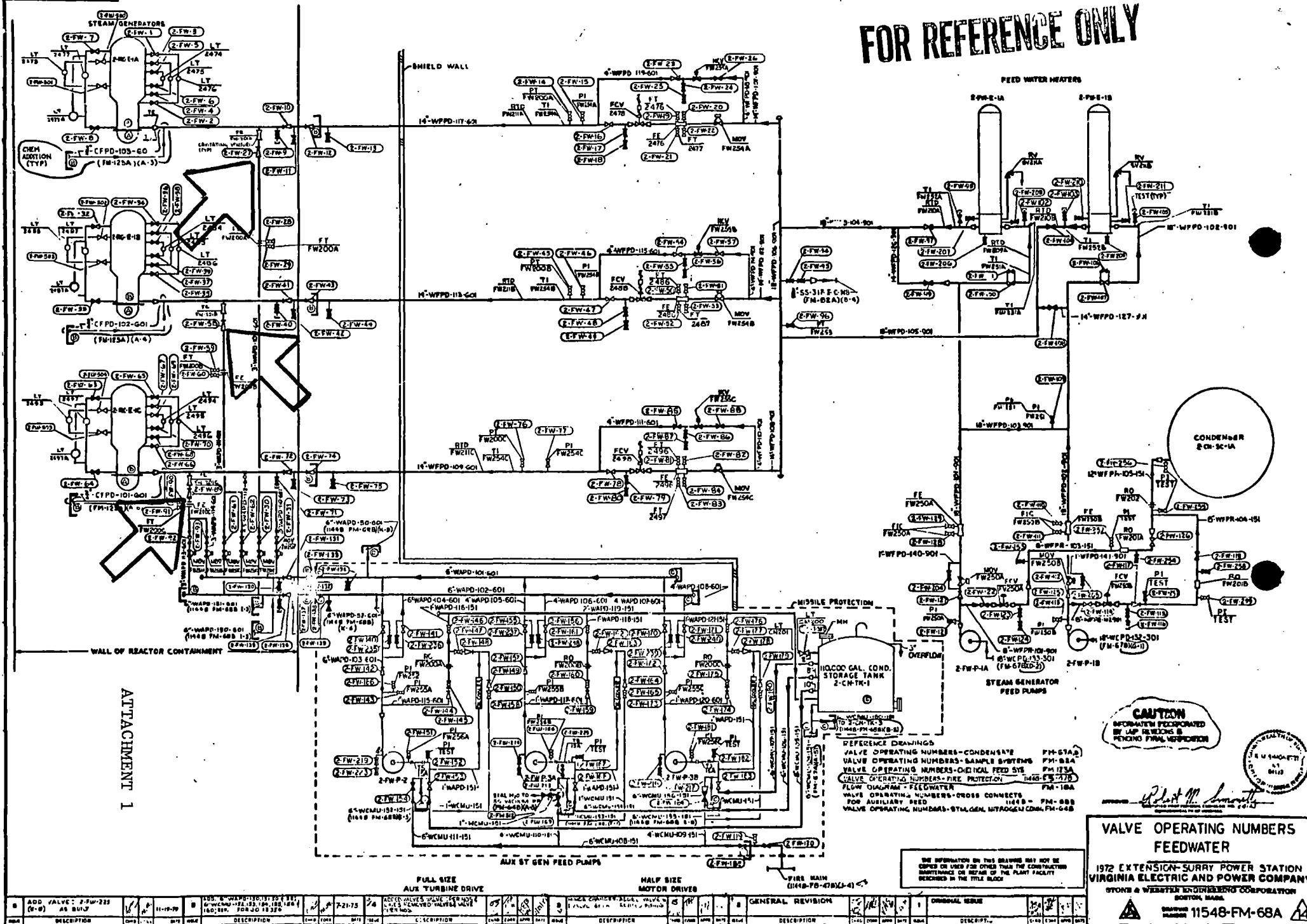
W. L. Stewart

Attachments (3)

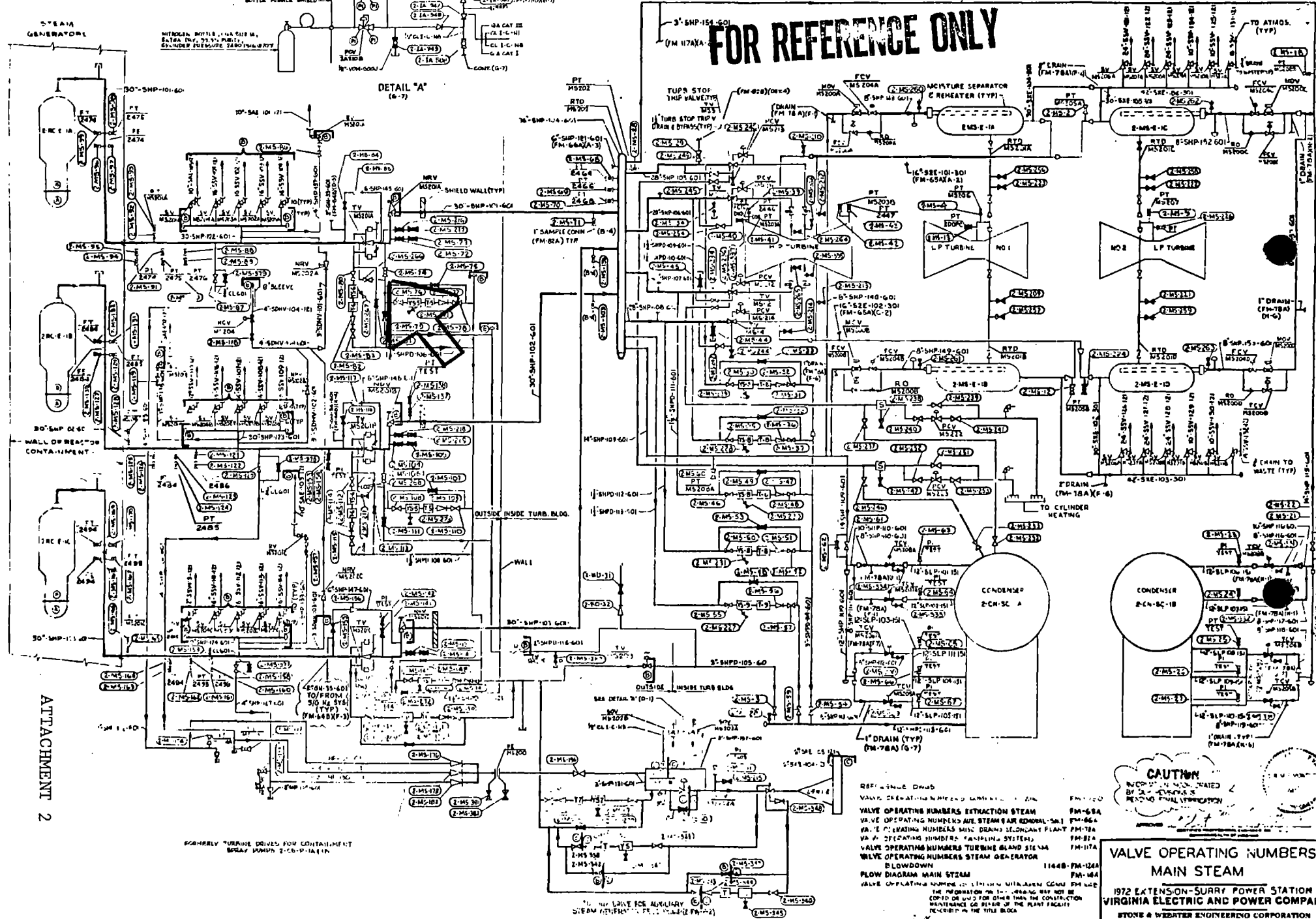
cc: Mr. James P. O'Reilly
Regional Administrator
NRC Region II

Mr. D. J. Burke
NRC Resident Inspector
Surry Power Station

FOR REFERENCE ONLY

VALVE OPERATING NUMBERS
FEEDWATER1972 EXTENSION-SURRY POWER STATION
VIRGINIA ELECTRIC AND POWER COMPANY
STONE & WEBSTER ENGINEERING CORPORATION
BOSTON, MASS.

11548-FM-68A



ATTACHMENT 2

NO.	DESCRIPTION	DATE	BY	CHKD.	APP'D.	REVISION
1	ADD: NEW TURBINE SAMPLE	10/10/80
2	ADD: NEW TURBINE SAMPLE	10/10/80
3	ADD: NEW TURBINE SAMPLE	10/10/80
4	ADD: NEW TURBINE SAMPLE	10/10/80
5	ADD: NEW TURBINE SAMPLE	10/10/80
6	ADD: NEW TURBINE SAMPLE	10/10/80
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9	ADD: NEW TURBINE SAMPLE	10/10/80
10	ADD: NEW TURBINE SAMPLE	10/10/80