

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

November 7, 1991

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

Serial No. 91-639
NL&P/JDH:jmj R1
Docket No. 50-339
License No. NPF-7

Gentlemen:

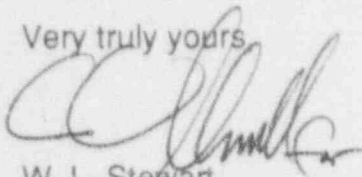
VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 2
INSERVICE INSPECTION PROGRAM
RELIEF REQUEST FROM ASME SECTION XI REQUIREMENTS
SAFETY INJECTION ACCUMULATOR VESSEL WELD EXAMINATION

On October 31, 1990 (Serial No. 90-652), we requested relief from certain safety injection accumulator vessel weld examinations. Based on subsequent discussions with the NRC staff, we have revised that relief request. The attached relief request supersedes our October 31, 1990 submittal.

Pursuant to 10 CFR 50.55a(g)(5), relief is requested from certain code requirements of ASME Section XI, 1974 Edition, Summer 1975 Addenda, associated with the safety injection accumulator tanks for North Anna Unit 2. Consistent with our previous request, we have determined the subject Code requirements to be impractical to the extent discussed in the attachment. The first inservice inspection interval for North Anna Unit 2 ended December 14, 1990. Based on the requirements of 10CFR50.55(g)(5)(iv), we request relief from the specified Code requirements by December 14, 1991.

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

Very truly yours,



W. L. Stewart
Senior Vice President - Nuclear

Attachment

A047
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cc: United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, GA 30323

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

**NORTH ANNA UNIT 2
RELIEF REQUEST FROM ASME SECTION XI REQUIREMENTS
SAFETY INJECTION ACCUMULATOR VESSEL WELD EXAMINATION**

Pursuant to 10 CFR 50.55a(g)(5), relief is requested from certain code requirements of ASME Section XI, 1974 Edition, Summer 1975 Addenda, associated with the safety injection accumulator tanks (welds 1, 2, 3 and 4) for North Anna Unit 2. This relief is required for North Anna Unit 2 for the first inspection interval, which ended on December 14, 1990. The basis for our request is provided below.

I. Identification of Components

2-SI-TK-1A, 1B and 1C - Safety Injection Accumulator Tank Welds

<u>Drawing No.</u>	<u>Weld No.</u>
VGB-2-1210	1, 2, 3, 4

II. Impractical Code Requirements

The Code requires in IWC-2500, category C-A and IWC-2600, item C1.1, that a volumetric examination be performed on the circumferential butt welds of a vessel. The examination would cover at least 20% of each weld uniformly distributed among three areas around the vessel circumference. These exams would be distributed as described in IWC-2411 over the four intervals (40 years).

III. Basis for Relief

The safety injection accumulator tanks (2-SI-TK-1A, 1B and 1C) are ASME Class 2 vessels, welds 1, 2, 3 and 4 (shown in attached drawing) are required to be examined as previously described. The condition of these welds, however, prevents full volumetric examination coverage (i.e., Code Case N-460 requires at least 90% of the required volume be examined). The welds must be prepared by grinding the surface smooth to ensure complete examination coverage. Additionally, access to weld 2 is extremely limited due to the vessel skirt. Partial volumetric (UT) examinations have been performed on 2-SI-TK-1A for welds 1, 3 and 4 (0 degree - 33%, 45 degrees - 18% and 60 degrees - 43% coverage). Weld 2 was not examined because of its access problem.

Completion of the original first interval requirements, requiring surface preparation and possibly new qualified procedures or techniques (weld 2) must be considered unnecessary, considering the newer Code requirements. The Code of reference for North Anna Unit 2 for the second interval per 10 CFR 50.55a (g) (4) (ii) is the 1986 Edition of ASME Section XI. This edition exempts this vessel type in paragraph IWC-

1221(e) from volumetric or surface examination. As such, no future examination is planned on these components, and continued financial and radiological dose investments as a result of the first interval requirements are deemed impractical.

IV. Alternate Provisions

As an alternative, it is requested that the first interval requirements to examine 2-SI-TK-1A, 1B and 1C as required by Category C-A, item C1.1 be considered complete based upon the partial examinations of welds 1, 3 and 4 and the 10 year hydrostatic test.

Illustrative Only

ACCUMULATOR TANKS

VGB-21210

Jan. 1, 1983

MATERIAL: SA-264 with 5/32"
clad A204 Type 304

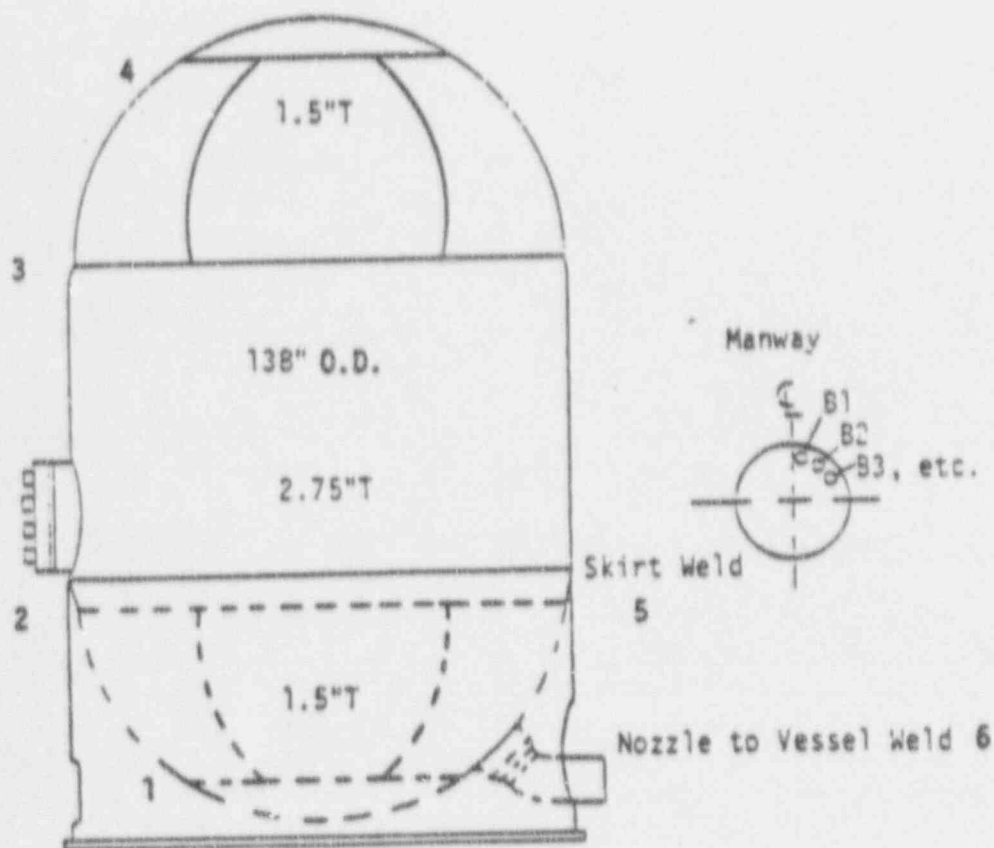
DIA: 138.0" O.D.

CIRC: 433.54"

SUPPORT: 1 Skirt Weld

BOLTING: 20 - 1.375 Dia.
8.5" Length

NOZZLE: 12" Sch. 40S (.375")
A312 Type 316



Zero Reference Centerline of Manway