

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 26, 2020

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Serial No. 20-096
SPS-LIC/MT R1
Docket Nos. 50-280/281
License Nos. DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REQUEST FOR APPROVAL TO USE A LATER AMERICAN SOCIETY OF
MECHANICAL ENGINEERS (ASME) CODE EDITION FOR EXAMINATION OF
CATEGORY C-A IN THE FIFTH INSERVICE INSPECTION (ISI) INTERVAL

Pursuant to 10 CFR 50.55a(g)(4)(iv), Virginia Electric and Power Company (Dominion Energy Virginia) requests NRC approval to use a portion of a later ASME Section XI Code edition for performing IWC-3510, "Standards for Examination Category C-A, Pressure Retaining Welds in Pressure Vessels," examinations during the fifth ISI interval for Surry Power Station Units 1 and 2. As discussed in the attachment, this request is consistent with NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI." NRC approval to use the later Code edition is requested by April 15, 2021.

If you have any questions or require additional information, please contact Mr. Gary D. Miller at (804) 273-2771.

Respectfully,



Mark D. Sartain
Vice President - Nuclear Engineering and Fleet Support

Commitments made in this letter: None

Attachment: Request for Approval to Use a Later Edition of ASME Section XI for Examination of Category C-A Welds during the Fifth Interval Inservice Inspection (ISI) Activities

cc: U.S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
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Attachment

**REQUEST FOR APPROVAL TO USE A LATER EDITION OF ASME SECTION XI
FOR EXAMINATION OF CATEGORY C-A WELDS DURING THE FIFTH INTERVAL
INSERVICE INSPECTION (ISI) ACTIVITIES**

**Virginia Electric and Power Company
(Dominion Energy Virginia)
Surry Power Station Units 1 and 2**

**Request for Approval to Use a Later Edition of ASME Section XI
for Examination of Category C-A Welds during the Fifth Interval Inservice
Inspection (ISI) Activities**

Surry Power Station Units 1 and 2

Virginia Electric and Power Company (Dominion Energy Virginia) requests NRC approval to use a later ASME Section XI Code edition for IWC-3510, "Standards for Examination Category C-A, Pressure Retaining Welds in Pressure Vessels," during the Fifth 10-year ISI Interval for Surry Power Station (Surry) Units 1 and 2. This request is consistent with NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI."

1. ASME Code Component(s) Affected

The affected ASME Section XI components are Class 2 pressure retaining welds in ferritic and austenitic steel pressure vessels, ASME Category C-A.

2. Applicable Code Edition and Requirements

The applicable ASME Section XI Code of Record for the Fifth 10-year ISI Interval is the 2004 Edition as approved by NRC letter dated April 29, 2013 (TAC NOS. ME8774 and ME8775) [ADAMS Accession No. ML13100A049].

3. Proposed Subsequent Code Edition and Requirements

The portion of the ASME Section XI 2013 Code Edition and addenda governing IWC-3510, "Standards for Examination Category C-A, Pressure Retaining Welds in Pressure Vessels," is proposed in its entirety for the Fifth 10-year ISI Interval of the Surry ISI Program. The 2013 Edition of ASME Section XI provides flaw limitations specific to austenitic steels in addition to acceptable flaw limitations for ferritic steels, while the 2004 Edition of ASME Section XI only addresses acceptable flaw limitations for ferritic steels. The ASME Section XI 2013 Code Edition has been approved for incorporation by reference into 10 CFR 50.55a in the Code of Federal Regulations with exclusions and limitations as stated. However, the exclusions and limitations do not affect the portion of the 2013 ASME Section XI Code being requested, i.e., IWC-3510.

4. Related Requirements

For the portion of the ASME Section XI 2013 Edition and addenda to be used, there are no related requirements, modifications, or limitations listed in 10 CFR 50.55a that apply to IWC-3510.

5. Duration of Use of Proposed Subsequent Code Edition and Requirements

This request is applicable for the Fifth 10-year ISI Interval for Surry Units 1 and 2, which started December 14, 2013 and May 10, 2014, respectively, and are scheduled to end October 13, 2023 and May 9, 2024, respectively.

6. Precedents

Similar approval to use a later ASME Section XI code edition and addenda has been previously granted for numerous licensees as listed below:

- Vermont Yankee Nuclear Power Station, Subject: Safety Evaluation of Request to Use Later Edition and Addenda of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) – Vermont Nuclear Power Station, dated July 25, 2005 [ML051870247].
- Oconee Nuclear Station, Subject: Oconee Nuclear Station, Units 1, 2, and 3 – Approval to Use a Later Edition of the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code, Section XI, dated July 9, 2007 [ML071790107].
- Virginia Electric and Power Company, Surry Power Station Units 1 and 2, Request for Approval to Use a Subsequent American Society of Mechanical Engineers (ASME) Code Edition and Addenda for Examination Categories B-L-1 and C-B in the Fourth Inservice Inspection (ISI) Interval, dated May 1, 2013 [ML13136A134].
- Nine Mile Point Nuclear Station, Unit Nos. 1 and 2 – RE: Request for Approval to Use a Later ASME Code Section XI Edition and Addenda for Examination Categories B-L-1, B-M-1, and C-G, dated March 14, 2014 [ML14064A339].
- Fort Calhoun Station, Unit No. 1 – Request to Use a Portion of a Later Edition of the ASME Code, Section XI, dated April 15, 2016 [ML16104A074].
- Arkansas Nuclear One, Unit 2 and Indian Point Nuclear Generating Station, Unit No. 3 – Relief Request EN-ISI-16-1 Regarding use of Later Edition and Addenda of the ASME Code, dated July 12, 2017 [ML17174B144].
- Salem Nuclear Generating Station, Subject: Salem Nuclear Generating Station, Unit No. 2 – Use of a Later Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, for Inservice Inspection Activities, dated May 29, 2018 [ML18142B126].
- Watts Bar Nuclear Plant, Unit 2 – Request to Use a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI for Containment Inservice Inspection Activities, dated August 23, 2018 [ML18227A599].