# VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

December 1, 1989

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No.: 89-730 PES/ISI/FPB R1 Docket Nos.: 50-280 50-281 50-338 50-339 License Nos.: DPR-32 DPR-37 NPF-4 NPF-7

Gentlemen:

### VIRGINIA ELECTRIC AND POWER COMPANY SURRY POWER STATION UNITS 1 AND 2 NORTH ANNA POWER STATION UNITS 1 AND 2 ASME SECTION XI RELIEF REQUESTS

In accordance with the provisions of 10 CFR 50.55a paragraph (g)(5), we are requesting relief from various requirements of ASME Section XI. The relief requests focus on the inspection frequency for component supports and the basic reporting requirements for steam generator tubing examinations. The specific relief requests and the bases for relief are provided in the attachment.

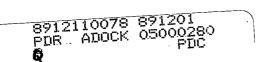
Should you require additional information, please contact us.

Very truly yours,

W. L. Stewart

Senior Vice President - Nuclear

Attachment



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 U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, N.W. Suite 2900 Atlanta, Georgia 30323

Mr. J. L. Caldwell NRC Senior Resident Inspector North Anna Power Station

Mr. W. E. Holland NRC Senior Resident Inspector Surry Power Station

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# Inservice Inspection Program Relief Requests

Surry Power Station Units 1 and 2 North Anna Power Station Units 1 and 2

Virginia Electric and Power Company

Site: North Anna Unit: 2

Interval: 1

## I. IDENTIFICATION OF COMPONENTS

ASME Section XI Class 3 Component Supports

# II. IMPRACTICAL CODE REQUIREMENTS

Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition, Summer 1975 Addenda, requires 100% of Class 3 component supports be examined each inspection period.

### **III. BASIS FOR RELIEF**

Later Editions of ASME Section XI require Class 3 component supports be examined on an interval basis thereby greatly reducing the number of supports requiring examination during each inspection period.

# IV. ALTERNATE PROVISIONS

It is proposed that the requirements of the 1983 Edition of ASME Section XI, Summer 1983 Addenda, be utilized for the selection and inspection frequency of Class 3 component supports.

Site: North Anna	Unit: 1	Interval: 2	Period: ALL	RR No.: NDE-24
Site: Surry	Unit: 1	Interval: 2	Period: 3	RR No.: NDE-15
Site: Surry	Unit: 2	Interval: 2	Period: 3	RR No.: NDE-15

### I. IDENTIFICATION OF COMPONENTS

Steam Generator Tubing, U-Tube Design (Category B-Q, Item Number B16.20)

#### II. IMPRACTICAL CODE REQUIREMENTS

Article IWA-6220 paragraph (8) of Section XI of the ASME Boiler and Pressure Vessel Code requires, in part, the following information to be included in the 90 day summary report:

an abstract of examinations, tests, replacements, or repairs performed; conditions recorded; and corrective measures recommended or taken;.

Examination of Category B-Q, Item Number B16.20, Steam Generator Tubing in U-Tube Design, is required to be included in the 90 day summary report as noted above.

### III. BASIS FOR RELIEF

Station Technical Specifications require the results of steam generator eddy current examinations be reported on an annual basis. The annual steam generator report lists the row, column, indications found, and location of those indications. This report offers the same information as required by ASME Section XI. Conforming to the reporting requirements of both ASME Section XI and plant Technical Specifications presents a duplication of effort on the part of both the licensee and the NRC staff.

#### IV. ALTERNATE PROVISIONS

It is proposed that the reporting requirements of station Technical Specifications be utilized in lieu of ASME Section XI for Category B-Q examinations.