

August 24, 2000

MEMORANDUM TO: File Center

FROM: Jack N. Donohew, Senior Project Manager, Section 2 */RA/*
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: RESPONSES TO QUESTIONS ON LICENSEE APPLICATION
REGARDING IMPLEMENTATION OF CHECK VALVE CONDITION
MONITORING PROGRAM OF 10 CFR 50.55a(b)(3)(iv) FOR WOLF
CREEK GENERATING STATION (TAC NO. MA9749)

Attached is an e-mail providing responses from the licensee regarding its August 16, 2000, (ET-00-0031) letter requesting approval to implement the Appendix II check valve condition monitoring program of 10 CFR 50.55a(b)(3)(iv). The responses provide clarification of the statements in the licensee's letter.

Docket No. 50-482

Attachment: E-mail dated August 23, 2000

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DATE	08/24/00	08/24/00		08/24/00		

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EMAIL DATED AUGUST 23, 2000

From: Wideman Steven G <stwidem@WCNOC.com>
To: "Jack Donohew" <JND@nrc.gov>
Date: Wed, Aug 23, 2000 1:03 PM
Subject: RE: Check Valve Monitoring program - II

Jack - provided in the attached file is a response to your 4 questions.

<<Raicheck>>

If you have additional questions or think a telecon is needed, please let Ken or myself know. Ken is in Training until tomorrow. David Claridge is at Callaway until next week.

Thanks.

Steve Wideman
WCNOC Licensing
phone: 316-364-4037
fax: 316-364-4138
e-mail: stwidem@wcnoc.com

> -----
> From: Jack Donohew[SMTP:JND@nrc.gov]
> Sent: Tuesday, August 22, 2000 3:00 PM
> To: kaharri@wcnoc.com; stwidem@wcnoc.com
> Subject: Check Valve Monitoring program - II
>
> <<File: Doc54.wpd>>
> Disregard my first email. I made an error in the first question of the
> earlier email to you. This is corrected in the attached file. You should
> know that I was given the following numbers for question 1 over the phone
> on 8/17/00: 189 total number of IST check valves and 84 tested
> bidirectionally. I am sending this to you because Ken Hall and David
> Claridge are not available. <JND>
>
>

CC: Harris Karl A <kaharri@WCNOC.com>, Hall Kenneth W ...

INFORMATION NEED FOR CHECK VALVE APPENDIX II PROGRAM RELIEF

CHECK VALVE CONDITION MONITORING PROGRAM

1. What is the number of inservice testing (IST) program check valves and how many are in the check valve condition monitoring program (CVCMP)? How many of the IST check valves are currently tested bidirectionally?

Response:

There are 189 check valves tested under the WCGS IST program. Of those 189, 84 check valves are tested bi-directionally and 34 check valves (which are part of the 84 check valves) are in the Check Valve Condition Monitoring Program. There are 105 check valves that currently do not specifically have both an open and close test. A preliminary review indicates that there are about 72 check valve that could readily be upgraded to demonstrate bi-directional capability. The remaining population of 33 valves would require disassembly and inspection or special examination techniques. These valves are all candidates for the Check Valve Condition Monitoring Program.

2. It is stated in the application that the testing of the IST check valves not in the CVCMP will be upgraded to ASME OM Code 1995 Edition/1996 Addenda requirements by September 1, 2003, prior to refueling outage XIII. Explain briefly why full implementation of these requirements is to be completed before a refueling outage. Is the testing to the new requirements for these non-CVCMP check valves to be done only in refueling outages? If these check valves are to be tested per the new requirements during the operating cycle, the implementation of the upgraded testing should be completed as soon during the operating cycle before refueling outage XIII as reasonable for the work to be done.

Response:

Certain check valves can only be tested during refueling outages. The population will be examined to identify the valves that can only be tested during refueling outages to complete their testing in Refuel XII (Spring 2002). The remaining population of valves will be tested or placed in the Check Valve Condition Monitoring Program prior to Refuel XIII (Fall 2003). It is anticipated that entry into an LCO may be needed to perform certain Check Valve Condition Monitoring Program activities. It took approximately 2 years to complete the analysis and changes necessary to implement Check Valve Condition Monitoring Program on the last 30 valves put into the Condition Monitoring Program.

To summarize, the following three items led us to determine a completion date of September 1, 2003:

1. Previous experience with the Condition Monitoring Analysis schedule needed
2. The current upgrade project of the IST program to ASME Code Case OMN-1
3. The LCO schedule plan prior to Refuel XIII

Given the ongoing upgrades in the IST program and the available resources, WCNOB believes that the September 2003 completion date is reasonable. WCNOB will attempt to complete testing activities as far in advance of Refuel XIII as possible, but need the flexibility to perform activities such as disassembly

and inspections on-line at any time during the entire interval to ensure that overall plant risk as measured by the Maintenance Rule a(4) assessment can be maintained as low as reasonably possible.

3. Will you send the staff a copy of the updated IST program for check valves after the full implementation of the ASME OM Code 1995 Edition/1996 Addenda requirements.

Response:

An updated copy of the IST Program Plan can be provided at the conclusion of the implementation of the Check Valve Monitoring Program test upgrades, which will be completed by September 1, 2003.

4. When does the current 10-year IST interval end for Wolf Creek?

The WCGS current 10 year interval ends September 2005.