



Entergy Nuclear Operations, Inc.  
Pilgrim Station  
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William J. Riggs  
Director, Nuclear Assessment

October 29, 2003

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
Docket No. 50-293  
License No. DPR-35

Pilgrim Fourth Ten-Year Inservice Testing (IST) Program  
IST Relief Request No. PR-05 for Standby Liquid Control System Pump  
Testing

LETTER NUMBER: 2.03.125

- REFERENCES:
1. Entergy Letter No. 2.02.109, Pilgrim Fourth Ten-Year Inservice Testing (IST) Program and Request for Approval of IST Relief Requests, dated December 6, 2002.
  2. NRC SER, Inservice Testing Program for Pilgrim Nuclear Power Station (TAC. No. M85069), dated June 23, 1993.

Dear Sir or Madam:

This letter requests NRC review and approval of the attached Standby Liquid Control (SLC) System Pump Relief Request PR-05 within the scope of the Fourth Ten-Year interval IST program (Reference 1). A similar relief topic was included as part of Relief Request RP-03 and was approved for the Third Ten-Year IST interval (Reference 2).

The scope of this relief applies to the 2-minute stabilization period that is required by the OM Code for the SLC pump Group A (comprehensive pump) test prior to recording the measured flow rate data. Since the SLC test tank capacity does not allow for operation of the SLC pump for more than 3 minutes, relief from the 2-minute stabilization period is necessary to conduct this test to obtain accurate and repeatable flow rate data. Note that for the Third IST interval the Code (IWP-3500 (a)) required that pumps be operated for five minutes stabilization period prior to measurement of test quantities (See Reference 2, section 2.3.1). Even though OM Code has relaxed the stabilization period to 2 minutes, relief from this 2-minute stabilization period is required because of the test tank capacity limitation.

Pilgrim has performed the Quarterly (Type B) SLC pump test, which does not require an approved relief request. The SLC comprehensive (Type A) pump surveillance test requires approved relief from the stabilization period. Pilgrim intends to complete the Type A pump surveillance test upon receipt of an approved relief request.

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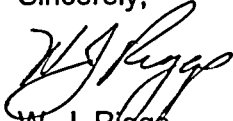
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Pilgrim Nuclear Power Station

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If you have any questions or require additional information, please contact Mr. Bryan Ford, Licensing Manager, at (508) 830-8403.

Sincerely,



W. J. Riggs

Attachment: Pump Relief Request, PR-05 (1 page)

cc: Mr. Travis Tate, Project Manager  
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Senior Resident Inspector  
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ATTACHMENT

Pump Relief Request, PR-05 (1 page)

PUMP RELIEF REQUEST PR-05

PUMPS: P-207A & P-207B

SYSTEM: Standby Liquid Control System (1101)

CLASS: 2

FUNCTION: Provides a method of shutting down the Reactor without use of the control rods.

TEST REQUIREMENTS: ISTB 5.6, Duration of Tests, 5.6.1 Group A Test – After pump conditions are as stable as the system permits, each pump shall be run at least 2 minutes. At the end of this time at least one measurement or determination of each of the quantities required by table ISTB 4.1-1 shall be made and recorded.

RELIEF REQUESTED: Determine the Standby Liquid Control (SLC) pump hydraulic parameter (measured flow rate) by establishing the reference pump discharge pressure during the procedure initial conditions (prior to the start of the flow measurement test), in lieu of running the pump for at least two minutes after pump conditions are as stable as the system permits.

BASIS FOR RELIEF: The SLC pumps are tested by pumping fluid from the SLC storage tank into a test tank. The test tank capacity does not allow for operation of the pump for more than 3 minutes. The OMB Code requires 2 minutes stabilization period before collecting accurate and repeatable flow rate data. If 2 minutes are allocated for stabilization period, there is insufficient time for additional system operation to produce accurate and repeatable flow rate data. Thus relief from the 2 minutes stabilization period is required. The present surveillance procedure has provided consistent test results and produces good repeatability.

During testing, the initial test conditions are established by starting the SLC pumps and adjusting the pump discharge test flow (throttle) valve to obtain the test reference discharge pressure. When the reference test pressure has been established the pump is stopped and the initial test tank level is measured. The pump is then restarted and allowed to run for three minutes. The test tank final level is measured and the pump flow rate is calculated. Pump flow rate calculations meet the requirements of table ISTB 4.7.1-1 for measured values.

ALTERNATE TESTING: The pump test procedure will establish the pump reference discharge pressure prior to conducting the 3-minute pump test run. When the initial conditions for reference discharge pressure are established the SLC pump will be stopped. The SLC pump will then be operated for exactly three minutes. An accurate measurement of the initial test tank level and final test tank level will be used to determine the measured test flow rate.