

ATTACHMENT 1

4 PAGES

ATTACHMENT #1

December 2, 1993

Subject: Summary of Changes to the Duke Power Company ASME IST Valve and Pump Testing Program and Description of Revisions For NRC SER, Dated July 23, 1993

1. The ONS INSERVICE TESTING MANUAL has been reclassified as ONS System Engineering Directive 4.7, ONS ASME Valve and Pump Testing Directive. The document has been expanded to include the methodology to determine how component should be selected, tested, and which acceptance criteria should be used to meet the recommendations of ASME IST and/or 10CFR50 Appendix B.

The format of the directive is as follows:

- the body of the directive describes our program and how testing should be incorporated,
 - the enclosures describe the methods of selection and administrative documents used to update the program,
 - the attachments are the tables listing the components included in our testing program and any code reliefs/justifications needed. All reliefs and justifications have been assigned numbers based on their classification (i.e. generic relief, individual component relief, cold shutdown justifications).
 - All Relief Request and Cold Shutdown Justifications were review for applicability. Some had their reasons strengthened others were deleted from the original submittal, some request/justifications were re-sequenced.
 - In cases where the NRC allowed us deviation from the 1986 Edition of ASME Section XI based upon the 1989 Edition of ASME Section XI no changes to these relief requests were made.
2. The revisions made to our site program to comply with the Inservice Testing Program, Revision 20, Third Inspection Interval, Safety Evaluation Report Response of July 23, 1993 is as follows:

Compliance with SER Evaluation Section 2.0:

- 2.1 Valve stroke times acceptance values and guidance for analysis of data has been changed to comply with OM-10 as suggested by NRC. Reference GNR-VLV-09.

- 2.2 The Reactor Coolant Makeup Pumps vibration instrumentation and our method of detector calibration is being upgraded. Reference GNR-PMP-05 and RR-PMP-01.
- 2.3 Based on a review of the Hydrogen Analyzer Sample Valves and the licensing requirements, these valves will be removed from the active valve list. These valves are not required for accident mitigation their testing will be changed to meet 10CFR50 Appendix B guidelines.

Compliance with SER - Table 1:

Note: The following only discusses items open, denied or not approved by a later approved version of the code.

- Pump No.3 Relief Request has been reassigned to RR-PMP-02. The relief has been further expanded upon.
- Pump No.5 Relief Request has been deleted and a modification installed to measure flow.
- Pump No.7 Relief Request has been reassigned GNR-PMP-04 and revised.
- Pump No.8 Relief Request has been reassigned to GNR-PMP-05. Procedures were changed to reflect provisions allowed in the TER and future enhancements were noted.
- Pump No.10 Relief Request has been reassigned to GNR-PMP-05. A modification is being installed to improve our instrumentation and calibration techniques.
- Generic Valve No.c Relief Request has been reassigned to GNR-VLV-03. This relief has been enhanced. The valves and their failure position are now on the Attachment. .
- Generic Valve No.g Relief Request has been reassigned to GNR-VLV-07. This relief has been enhanced.
- Generic Valve No.i Relief Request has been reassigned to GNR-VLV-09. This relief has been enhanced to include OM Part 10, paragraph 4.2.1.8.
- Valve No.3 Relief Request has been deleted. The PORV has been reclassified as ASME Category C and being testing accordingly.

- Valve No.4 Relief Request has been reassigned to RR-VLV-04. This relief has been revised.
- Valve No.5 Relief Request has been reassigned to RR-VLV-05. This relief has been revised.
- Valve No.6 Relief Request has been reassigned to RR-VLV-06. This relief has been revised.
- Valve No.7 Relief Request has been reassigned to RR-VLV-07. This relief has been revised.
- Valve No.8 Relief Request has been reassigned to RR-VLV-08. This relief has been revised.
- Valve No.9 Relief Request has been reassigned to RR-VLV-09. This relief has been revised.
- Valve No.10 Relief Request has been reassigned to RR-VLV-10. This relief has been revised.
- Valve No.11 Relief Request has been reassigned to RR-VLV-11. This relief has been revised.
- Valve No.12 Relief Request has been reassigned to RR-VLV-12. This relief has been revised.
- Valve No.21 Relief Request has been reassigned to RR-VLV-21. This relief has been revised.
- Valve No.29 Relief Request has been reassigned to RR-VLV-29. This relief has been revised.
- Valve No.32 Relief Request has been reassigned to RR-VLV-32. This relief has been revised.

Compliance with TER Section 5 (not discussed in SER):

Note: The following only discusses items open, denied or not approved by a later approved version of the code and not previously answered.

5.1 The System Directive 4.7 was issued to administratively reissue the ONS IST Manual. The directive is an enhanced version of the "OLD" ONS IST Manual and includes some of the suggestions of the TER.

5.2 See response for TER 5.1.

- 5.3 The IST Pump and Pump Test lists now include P&IDs. See Attachment 10 & 11.
- 5.15 Since the ONS submittal requested approval to ASME Section XI IWV/IWP(1986), we understand that approval is given to us on Cold Shutdown Justifications on the basis that the later accepted approved version of the code (OM-10a-1988) doesn't require this.
- 5.24 The Relief Request was deleted and Cold Shutdown Justification, CSD-VLV-09 was issued.
- 5.25 Relief Request NO.24 was reassigned to RR-VLV-24. The relief has been revised with the information asked for.
- 5.29 All Cold Shutdown Justifications were reviewed: some were revised to document better our reason, and some were deleted based on re-evaluating the testing consequences during operation.
- 3.0 Attachment #7, 10CFR50 Appendix B valves justifications are not included in this submittal. This is a new approach to administratively document variances in testing from code practices on these valves. The valves addressed in Attachment #7 are not required to be tested in accordance with ASME Section XI or 10CFR50.55a.

ATTACHMENT 2