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SORENSON, G. C. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

Revised 1/28/86 mm.

SUBJECT: Forwards Rev 3 to "Pump & Valve Inservice Test Program Plan" for approval. Changes correct clerical errors. Fee paid.

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Washington Public Power Supply System
3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

December 26, 1985

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Ms. E. G. Adensam, Project Director
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

Subject: NUCLEAR PLANT NO. 2
REQUEST FOR INTERIM APPROVAL OF REVISION 3 TO THE WNP-2 PUMP AND VALVE INSERVICE TEST PROGRAM PLAN WITH CHANGES DESCRIBED HEREIN

References:
1) Letter, W. R. Butler (NRC) to G. C. Sorensen (SS) "Pump and Valve Inservice Testing Program Review - Meeting Minutes", dated June 10, 1985

2) Letter, GO2-85-319, G. C. Sorensen (SS) to W. R. Butler (NRC), "Submittal of Revision 3 to WNP-2 Pump and Valve Inservice Test Program Plan", dated June 17, 1985

The version of the subject Plan currently approved (on an interim basis) by the NRC is Revision 2, dated November 3, 1983. Since Revision 2 of that Plan was submitted prior to WNP-2 entering into commercial operation, it has been found to require numerous changes due to lessons learned regarding actual system operating and testing configurations as well as design changes occurring in the late construction completion phase of the plant.

Reference 1 documents a meeting on April 16 and 17, 1985 in Bethesda to review the WNP-2 Pump and Valve Inservice Testing Program. The meeting was a working session attended by personnel from the Supply System, EG&G (the NRC contractor), and the NRC. The version of the Plan discussed at the meeting was an upgraded version of Revision 2 (i.e. Revision 3) reflecting knowledge gained by operating experience through the first quarter of commercial operation.

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REQUEST FOR INTERIM APPROVAL OF REV. 3 TO THE WNP-2 PUMP & VALVE INSERVICE TEST PROGRAM PLAN WITH CHANGES DESCRIBED HEREIN

Revision 3 of the Plan, dated June 10, 1985, was subsequently submitted to the NRC per Reference 2. Revision 3 of the Plan reflects the incorporation of the various comments from the meeting and as such is considered far superior to Revision 2 of the Plan. Since Revision 2 of the Plan is obviously outdated, we are basing our current revisions to the implementing surveillance test procedures on the criteria contained in Revision 3, as further modified by additional changes described in Attachment A. The Supply System is therefore requesting your interim approval of Revision 3 of the Plan and the specific changes described in Attachment A pending completion of a formal comprehensive review such that we will continue to have a legitimate basis for our implementing procedures.

Enclosed is an application fee of One hundred fifty dollars ($150.00) in accordance with 10 CFR 170.12(f). Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

RPW/tmh
Attachments

cc: RC Barr - BPA
JO Bradfute - NRC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
AD Toth - NRC Site

ATTACHMENT A

Description of Specific Changes to Revision 3

1. Several clerical errors have been identified and corrected.

2. Valves, SW-V-214, 215, 216, and 217 have no manual control switch and no remote position indicators. Attempts to measure valve stroke times have yielded inconsistent and misleading results. This requires relief from IWV-3413, measure the stroke time of power operated valves. These valves will be verified to stroke in a timely manner and continue to be exercised quarterly. This is similar to Relief Request RV-10 and RV-12. See Relief Request RV-21.

3. Temperature Control Valves, SW-TCV-15A and 15B will be added to the Plan. These valves have a required fail position (open) in order for the system to operate and perform its safety function. This is the same reason SW-TCV-11A and 11B were added in Revision 3.

4. Temperature Control Valves, SW-TCV-11A, 11B, 15A, and 15B have no manual control switch or valve position indication. Measurement of valve stroke time per IWV-3413 is not practical. These valves will be verified to operate in a timely manner and continue to be exercised quarterly. This is similar to Relief Request RV-10 and RV-12. See Relief Request RV-22.

5. Pumps, DO-P-1A, 1B, and 2 are submersible pumps. The requirement to observe proper lubrication level and/or pressure per IWP-3100 is not applicable.

   The diesel oil transfer pumps (DO-P-1A, 1B and 2) do not have a rate or quantity meter installed in the test circuit per IWP-4600. However, WNP-2 employs a flowrate measurement test methodology which yields equivalent results by measuring the change in tank volume. Relief from IWP-4600 is requested in RP-5.

6. A single keylock control switch is used to operate the nine inboard Post Accident Sampling valves performing a containment isolation safety function. It is not practical to measure the stroke times of all nine valves per IWV-3413. These valves will be tested quarterly and the stroke time of the slowest of the nine valves will be recorded. This is similar to Relief Request RV-19. See Relief Request RV-23.

7. Valves, RWCU-V-1, 4, and 40 can not be tested during normal power operations without jeopardizing the RWCU pumps. Testing interrupts flow through the pumps causing them to overheat, significantly increasing the potential for equipment damage. These valves will be tested during cold shutdowns per IWV-3412.