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SUBJECT: Clarifies inservice testing program for pumps & valves, per  
 Generic Ltr 89-04 re cold shutdown, containment deinerted  
 testing & relief requests applicable to all valves.

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July 31, 1991  
G02-91-143

Docket No. 50-397

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

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
WNP-2 INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES  
(TAC NO. 60493)

- Reference: 1) Letter, PL Eng to GC Sorensen, "Safety Evaluation of the Washington Public Power Supply System Nuclear Project No. 2 (WNP-2) Inservice Testing Program for Pumps and Valves (TAC No. 60493)", dated May 7, 1991
- 2) Generic Letter 89-04, "Guidance of Developing Acceptable Inservice Testing Programs", dated April 3, 1989

In Reference 1 the NRC provided the results of the review and evaluation of the WNP-2 Inservice Testing Program Plan for pumps and valves. This review granted some relief requests and denied others. Additionally this Safety Evaluation Report (SER) provided a time table for the implementation of the required changes to the IST program and procedures. It is our understanding that with the SER issued, WNP-2 is expected to comply with GL 89-04, Reference 2. The Generic Letter states that for plants listed in Table 1, the NRC will be issuing an SER in the near future and no response is required.

A review of the recently issued SER against GL 89-04 shows that some check valves in the WNP-2 IST Program Plan are not full flow tested with a known accident flow rate as specified in position 1 of GL 89-04. These valves are currently being full stroke, partial flow tested. This test method is not in compliance with position 1 of GL 89-04. Prior to the issuance of GL 89-04, the Supply System believed this method of testing was in compliance with ASME Section XI requirements. The Supply System plans on completing a detailed review of all check valves in the IST program to determine whether full flow testing, non-intrusive testing or disassembly will be used to satisfy the check valve testing requirements of the Code as amplified by GL 89-04.

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The other Staff positions contained in GL 89-04 appear to be addressed by the SER, but these positions will be reviewed to ensure the WNP-2 IST Program Plan is in compliance with GL 89-04.

Two program clarifications are hereby submitted since these clarifications will be used prior to formal submittal of the revised WNP-2 IST Program Plan.

1. Cold Shutdown, Containment Deinerted Testing

Section 3.1.7 of the Technical Evaluation Report (TER) transmitted with Reference 1 evaluates relief request RV-25. This new relief request was prepared at the NRC's request and submitted during the IST program review to specify how valves which cannot be tested during normal reactor operation are tested at cold shutdown.

RV-25, using ASME OM-10 as a basis, states cold shutdown testing shall commence within 48 hours of achieving cold shutdown (CSD). The CSD testing will be terminated when all valves are tested or when the plant is ready to restart.

This position is consistent with NRC guidance and with ASME OM-10 which is currently being reviewed by the NRC with endorsement expected. This relief request was granted with the provision that it applied only to those valves which could be tested at each CSD.

Relief requests for all valves which cannot be tested at each CSD have been submitted with the IST program and approved by the NRC in the SER, Reference 1. If new valves are added to the IST program which would require the containment to be deinerted for testing, a relief request will be submitted to allow testing at CSD with the containment deinerted.

Cold shutdown testing for valves requiring a deinerted containment will be tested as described above and in accordance with the definition of Exercise Frequency, Note 9, preceding the valve tables of the WNP-2 IST Program Plan. That is, CSD testing will commence within 48 hours of the containment being deinerted and will continue until all valves are tested or the plant is ready to restart. The Supply System views this as a clarification with no additional relief required.

WNP-2 INSERVICE TESTING PROGRAM  
FOR PUMPS AND VALVES

2) Relief Requests Applicable to All Valves

Five relief requests, RV-1, RV-4, RV-15, RV-20 and RV-25 in the WNP-2 IST Program Plan apply to all applicable valves currently in the IST program. Each Section of the TER and Table 1 of the SER, Reference 1 state that these relief requests apply to all valves in the program. This was the Supply System's intent. Therefore, if a valve is added to the IST program and the relief request is applicable, then that relief request will be used. Again, this is considered a clarification with no additional relief required. When the new valves are added to the IST program, the revised program will be submitted to the NRC on a periodic basis.

The Supply System will submit to the NRC the results of GL 89-04 review with its review of the SER, Reference 1. Additional relief requests, program clarifications and changes will be submitted on the time table specified in the SER.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

TFH/bk

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