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SUBJECT: Forwards Rev 4 to "Pump & Valve Inservice Test Program Plan, WPPSS-2." Plan submitted per Generic Ltr 89-04. Relief requests encl.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

December 3, 1991
G02-91-220

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)

- References: 1) Letter, PL Eng (NRC) to GC Sorensen (SS), "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) Letter, G02-91-143, GC Sorensen (SS) to NRC, same subject, dated July 31, 1991
- 3) Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs", dated April 3, 1989
- 4) Minutes of the Public Meetings on Generic Letter 89-04, dated October 25, 1989
- 5) Supplement to Minutes of the Public Meetings on Generic Letter 89-04, dated September 26, 1991

In Reference 1, the NRC provided the results of the review and evaluation of the WNP-2 Inservice Testing Program Plan. This review was based on Revision 3 and Revision 3B of the IST Program and additional information supplied to the NRC by letters referenced in Reference 1. The IST program addressed in this Safety Evaluation (SE) covers our first ten-year interval from December 13, 1984 to December 13, 1994. This SE denied certain relief requests while accepting others for implementation, provided the anomalies identified in Appendix B of the Technical Evaluation Report are addressed within the specified time frame.

In Reference 2, the Supply System provided an initial response to the SE and committed to review the Supply System's IST Program Plan and implementing procedures against the positions in Generic Letter 89-04 (References 3, 4, and 5) with special emphasis on the testing of check valves. This letter responds to those items requiring resolution within six months as described in Reference 1. It also documents the completion of the comparison of the Supply System's IST Program Plan requirements and the GL 89-04.

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The Supply System has revised the WNP-2 Pump and Valve Inservice Test Program Plan. Revision 4 incorporates the changes proposed in the SE, program clarifications, additional relief requests, additions and deletions due to plant modifications, and editorial changes. A brief explanation and summary of each change is provided in Attachment 1. Revision 4 of the IST Program Plan is included as Attachment 4.

The Supply System has addressed all the items discussed in Appendix B of the Technical Evaluation Report, EGG-NTA-8427, (Reference 1). Necessary IST program changes and implementing procedure changes have been made. Attachment 2 contains the description of each of the 18 items and the status of the resolution. Any exceptions or delays in implementing the resolution of items are discussed in the Supply System's response to the items.

Revision 4 of the IST Program Plan also contains the changes resulting from the review of testing of check valves. Changes to the implementing procedures have also been completed. A list of valves presently not in compliance, proposed changes to the program and procedures, and a schedule for implementation are provided in Attachment 3. The remaining positions in GL 89-04 have been reviewed and the Supply System has made necessary program changes and implementing procedure revisions needed to be in compliance with the applicable positions.

Revision 4 also contains the request for approval of the following additional relief requests with the approval need date specified where required. This need date will allow the Supply System to change implementing procedures to conduct these tests at the next refueling outage.

Relief Request RP-7

WNP-2 implementing procedures for pump testing use a reference curve instead of a fixed reference point. This position was previously discussed with PL Eng and T Sullivan of the NRC staff and we were advised to document this practice via a relief request after receipt of the SER.

Relief Request RV-26

There are no test connections to allow back flow testing of check valves SLC-V-33A and 33B on a quarterly basis. The Supply System is seeking relief from quarterly testing and is proposing to back flow test these valves during refueling outages when associated relief valves providing a test connection are removed for testing.

Relief Request Approval Need Date: January 10, 1992

Relief Request RV-27

As explained in this relief request, positive means of verifying valve closure of these valves is by performing a Technical Specification required leakage test during refueling outages. Also, full opening of valves can be verified by injecting maximum required accident flow through these valves only during refueling outages. This relief request will supersede relief request RV-9.

Relief Request Approval Need Date: January 10, 1992.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

RR/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
PL Eng - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
RG Waldo - EFSEC

SUMMARY OF CHANGES REVISION 4 OF THE IST PROGRAM PLAN

All the changes are listed under the following categories and are indicated by a revision bar on the affected Pages.

A. Technical Changes requiring NRC Review

1. Relief Request RP-7, Pages 3.6-10, 11 and 12
2. Relief Request RV-26, Page 4.5-43
3. Relief Request RV-27, Pages 4.5-44, 45 and 46

B. Additions to IST Program

1. Diesel Start Air Valves, added in response to TER Appendix B, Item 14.

Affected Pages: 4.4-12 and 13 Valve Tables
4.4-47 New Note 12

2. HCU Valves, added in response to TER Appendix B, Item 15

Affected Pages: 4.4-14 Valve Tables
4.4-47 New Note 11

3. MS-V-146, added based on reevaluation of the valve's function.

Affected Pages: 4.4-19 Valve Table
4.4-44 New Note 1S to justify cold shut down testing

4. RCIC-V-204, added to the system based on design change.

Affected Pages: 4.4-31 Valve Table
4.4-45 Added to Note 2

C. Deletions to IST Program

1. Valves DO-V-40A and 40B deleted from the system due to design change.

Affected Pages: 4.4-12 Valve Table
4.5-22 Deleted Relief Request No. RV-12

2. Valves SW-V-90 and 92, due to design change, no longer perform safety function.

Affected Page: 4.4-38 Valve Table

3. Valves SW-V-214, 215, 216 and 217 deleted from the system due to design change.

Affected Pages: 4.4-39 Valve Table
4.5-37 Deleted Relief Request No. RV-21

D. Changes to Comply With SER

Added reference to applicable SER/TER section and other changes to comply with SER/TER evaluation.

<u>Affected Pages</u>	<u>Change Description</u>
3.5-3 & 4	Delete measurement of bearing temperatures based on Relief Request RP-1
3.6-2 & 3	Relief Request RP-1
3.6-4	Relief Request RP-2
3.6-5	Relief Request RP-3
3.6-7	Relief Request RP-5
3.6-8	Relief Request RP-6
3.6-9	Relief Request RG-1 Deleted
4.5-2	Relief Request RV-1
4.5-5	Relief Request RV-2
4.5-6	Relief Request RV-3
4.5-8	Relief Request RV-4
4.5-13	Clarify note D of RV-4 Table that PIVs are not subject to Type C leak test.
4.5-15	Relief Request RV-6
4.5-16	Relief Request RV-7
4.5-17	Relief Request RV-8
4.5-18, 19, 21, 30 and 31.	Provided clarifications for cold shut down testing for Relief Requests RV-9, RV-11 and RV-18 similar to RV-25.
4.5-23	Relief Request RV-13
4.5-24	Relief Request RV-14
4.5-25	Relief Request RV-15
4.5-28	Relief Request RV-16, Deleted
4.5-29	Relief Request RV-17
4.5-32	Relief Request RV-19, Deleted
4.5-33	Relief Request RV-20

<u>Affected Pages</u>	<u>Change Description</u>
4.5-38	Relief Request RV-22
4.5-39	Relief Request RV-23
4.5-40	Relief Request RV-24
4.5-41 & 42	Relief Request RV-25

E. Editorial Changes and Program Clarifications

Minor non-technical editorial changes have been made to update and clarify the IST Program Plan.

Affected Pages:

1-1, 3.1-1, 3.2-2, 3.3-1, 3.4-1, 3.7-1, 3.8-2, 3.8-3, 3.8-4, 4.1-1, 4.2-1, 4.4-2, 4.4-3, 4.4-9, 13, 15, 16, 19, 20, 27, 28, 31, 33, 34, 36, 37, 38, 39, 41, 44, 45, 46 and 47.
 4.5-3, 9, 10, 12, 17, 26, 34, 35 and 36.
 4.6-2, 4.6-3, 6-1

SAFETY EVALUATION OF WNP-2 INSERVICE TESTING PROGRAM
FOR PUMPS AND VALVES

Response to Appendix B "IST Program Anomalies Identified During the Review"

1. The licensee has requested to change the method by which relief requests are evaluated and relief from the ASME Code, Section XI, requirements is granted by the NRC. The method proposed by the licensee would allow the exemption of pumps or valves from testing to the Code requirements where the licensee determines that a precedent exists that is applicable for that component. This method could result in delaying NRC review of significant changes to the IST program plan scope for an unspecified interval until the licensee submits an updated program to the NRC. Relief should not be granted as requested.

Supply System Response:

Relief Request RG-1 has been deleted in Revision 4 of the IST Program Plan.

2. The licensee has proposed to use pump vibration velocity measurements rather than vibration displacement measurements. This method has been demonstrated to provide better indication of pump degradation. Relief should be granted provided the licensee complies with all of the OM-6 vibration measurement requirements.

Supply System Response:

All of the vibration measurement requirements of OM-6 have been incorporated into the IST Program Plan with the exception of acceptance criteria for the diesel fuel oil transfer and fuel pool cooling pumps. The acceptance criteria for the pumps are as shown in TER Section 2.1.5.1.1 which has been incorporated into the surveillance procedures. The acceptance criteria for certain pump locations are not specified in the revised surveillance procedures. This criteria will be determined and included in the procedures upon completion of the performance of the regularly scheduled surveillances.

3. The licensee has requested relief from the vibration acceptance criteria of OM-6 for the fuel pool cooling and diesel fuel oil transfer pumps and proposed alternate limits and to evaluate the feasibility of reducing the vibration levels to the OM-6 upper limits. The licensee's proposed limits do not provide an acceptable long-term alternative. Interim relief should be granted for one year or until the next refueling outage, whichever is longer.

Supply System Response:

The surveillance procedures for these pumps have been modified to use the expanded limits on an interim basis. During the extended R-6 outage diesel fuel oil transfer pump, DO-P-2, was disassembled to determine the cause of the high vibration. Some problem areas were identified and are being investigated. Though we feel confident that the existing vibration levels can be reduced considerably, meeting OM-6 acceptance limits may require major design changes. Evaluation of high vibration of the diesel fuel oil and fuel pool cooling pumps is continuing.

4. The licensee has requested relief from the Code inlet and differential pressure measurement requirements for the standby service water and HPCS diesel cooling water pumps and proposed to verify proper spray pond level and to measure pump discharge pressure and flow rate to demonstrate pump operational readiness. Relief should be granted provided the licensee assigns acceptance criteria to discharge pressure that gives protection equivalent to that provided by the Code as described.

Supply System Response:

A review of the HPCS diesel and standby service water pumps was conducted to determine if the acceptance criteria based on discharge pressure was less conservative than specified in the Code. The review showed that for pumps which operate with a suction lift, discharge pressure is smaller than differential pressure and thus acceptance criteria based on discharge pressure are conservative.

5. The licensee has requested relief from the Section XI requirements for flow rate measurement for the diesel fuel oil transfer pumps and proposed to derive this value by determining the volume, in gallons, pumped and dividing this quantity by the total operating time of the pump. Relief should be granted provided the pump flow rate calculation meets the accuracy requirements of Table IWP-4110-1.

Supply System Response:

A review of the flow rate determination methodology for these pumps showed that the calculated accuracy did not meet the Code required 2% accuracy. The surveillance procedures have been revised to require each pump be run for a minimum of 25 minutes. The increased run time and the corresponding increase in the level change ensures the accuracy of 2% is met. It should be noted that when the effects of range are taken into account for a gage, the total inaccuracy for a reading can be as high as 6%. Therefore, the Supply System approach is superior to the use of the gage which is acceptable per the Code.

6. The licensee has requested relief from the Section XI requirements for differential pressure measurement for the diesel fuel oil transfer pumps and proposed to derive this value by measuring the height of fluid above the pump's suction. Relief should be granted provided the pump differential pressure calculation meets the accuracy requirements of Table IWP-4110-1.

Supply System Response:

A review of the inlet pressure determination methodology for these pumps showed that the calculated accuracy for inlet pressure did not meet the Code required 2% accuracy. The surveillance procedures have been changed to insure inlet pressure is determined to be well within the 2% Code requirement.

7. The licensee has proposed to establish target leak rate values, usually not fixed, based on valve type and size for those valves being Appendix J, Type C, leak rate tested. These target values are for use in evaluating the leak tightness of Category A containment isolation valves. Leak rate testing is to be performed in accordance with 10 CFR 50, Appendix J, and WNP-2 Technical Specification requirements. The 10 CFR 50, Appendix J, leak testing does not trend or establish corrective actions based on individual valve leakage rates as required by paragraphs IWV-3426 through -3427. Neither the licensee's Technical Specification limits nor the collective criteria of Appendix J have been shown to provide adequate assurance of individual component operational readiness as provided by paragraph IWV-3426. The collective criteria of Appendix J have not been demonstrated to be more appropriate since those may allow a single valve to be significantly degraded. Relief should be granted from IWV-3421 through -3425 provided the licensee complies with the requirements of paragraphs IWV-3426 and 3427(a).

Supply System Response:

Plant surveillance procedures have been revised to include specific acceptance criteria and require valve repair or replacement if the acceptance criteria are exceeded as required by paragraphs IWV-3426 and 3427(a).

8. The NRC staff's position is that when a valve serves both a containment isolation function and a pressure boundary isolation function it must be tested to both the Appendix J requirements, to assure its CIV function, and to the IWV-3420 and Plant Technical Specification requirements to assure its PIV function. Request for Relief No. RV-4 does not make it clear that WNP-2 is adhering to this position. Any PIVs that also perform a containment isolation function must be leak rate tested to the Appendix J and IWV-3426 and 3427(a) requirements to verify their ability to perform a CIV function. Relief should be granted as requested from the requirements of IWV-3427(b).

Supply System Response:

The PIV's at WNP-2 comply with IWV-3426 and 3427(a). That is, they are tested at a nominal 950 psid with specific acceptance criteria established. This acceptance criterion is 1 gpm as specified in Plant Technical Specification 3.4.3.2e. The WNP-2 Appendix J program (WNP-2 Plant Technical Specification 4.6.1.2.d.4) specifically excludes these PIV's from an Appendix J test. Therefore, these valves meet the Appendix J criteria (by exception) and the Section XI criteria. Note D of Relief Request RV-4 has been revised to clarify this position.

9. The licensee has requested relief from exercising the water leg fill and pressurization check valves in accordance with the Section XI test method requirements and proposed to full-stroke exercise these series valves open, verify at least one valve of the series shuts, and operate the stop-check manually, quarterly. Relief should be granted provided the pair of series check valves is verified closed quarterly and if excessive leakage is noted, both valves are repaired or replaced prior to their return to service.

Supply System Response:

The series check valves are verified open by their ability to fulfill their system function. They are also verified closed, and if excessive leakage is noted, both of the valves are declared inoperable. Corrective action on both valves and a retest is required by plant procedures to return the valves to service.

10. The licensee has requested relief from the Code test frequency requirements for valves that can be tested only during cold shutdowns and proposed to test these valves during cold shutdowns at the frequency described in their relief request. For any valve, or class of valves, that cannot be tested during each cold shutdown of sufficient duration to complete all testing, a relief request must be submitted and approved by NRC prior to implementation. Relief should be granted only for those valves that can be tested during any cold shutdown.

Supply System Response:

The Supply System formally responded to this item in a letter to the NRC, G02-91-143, dated July 31, 1991. Relief Requests RV-9, 11, 18, and 25 have been revised to comply with the SER. Relief requests for all valves which cannot be tested at each cold shutdown have been submitted with the IST Program Plan and approved by the NRC in the SER, Reference 1. If new valves are added to the IST Program Plan which would require the containment to be deinerted for testing, a relief request will be submitted to allow testing at cold shutdown with the containment deinerted.

11. The licensee has requested relief from exercising the vacuum relief valves for the reactor core isolation cooling (RCIC) turbine exhaust in accordance with the Code test frequency and method requirements and proposed to full-stroke exercise both valves open and at least one of these valves shut quarterly and to verify closure of each valve at refueling outages. Since the licensee has not demonstrated the impracticality of testing these valves to the Code required frequency and the licensee's proposed alternate testing does not provide a reasonable alternative to the Code requirements, and considering the burden on the licensee if the Code requirements were imposed, relief should not be granted as requested.

Supply System Response:

Relief Request RV-16 has been deleted in Revision 4 of the IST Program Plan. The surveillance procedure has been revised to test the subject valves, RCIC-V-111 and V-112 at the code specified frequency and method. No additional action is required.

12. The licensee has requested relief from the Section XI stroke time measurement requirements for various power operated valves and proposed to verify these valves stroke quarterly but not measure stroke times. The licensee's proposal to verify valve operation observing various system or component indications should demonstrate these valves operate but is not likely to detect valve degradation, short of complete failure. Therefore, the proposed testing does not provide a reasonable long term alternative to the Code requirements. Interim relief should be granted for one year or until the next refueling outage, whichever is longer. During this interim period, the licensee should consider methods, such as ultrasonics, magnetics, and acoustics for stroke timing or otherwise adequately monitoring the condition of these valves, and should determine appropriate acceptance criteria so that a severely degraded valve is identified for corrective action.

Supply System Response:

Plant Technical will pursue alternative testing techniques which are in compliance with ASME Section XI. As indicated below, two relief requests have been deleted from Revision 4 of the IST Program Plan due to deletion of the valves from their system. Before completion of R7, the Supply System will address the remaining two and potential testing techniques.

<u>TER SECTION</u>	<u>RELIEF</u>	<u>VALVE</u>	<u>REMARKS</u>
3.5.1.1	RV-21	SW-V-214,215, 216,217	These valves have been deleted. RV-21 deleted.
3.9.2.1	RV-24	CIA-SPV-1A-15A -1B-19B	Alternatives are being investigated by R-7.
3.12.1.1	RV-12	DO-V-40A,B	These valves have been deleted. RV-12 deleted.
3.13.1.1	RV-22	SW-TCV-11A,11B, 15A,15B	Alternatives are being investi- gated by R-7.

13. The licensee's proposed test method for the identified hydraulic control system valves does not provide an adequate demonstration of valve operability since it only monitors the stroke time of the slowest valve of the group for an indication of degradation. The proposed testing does not provide a reasonable alternative to the Code requirements, the licensee has not demonstrated the impracticality of performing this testing in accordance with the Code requirements and the Code requirements are not considered excessively burdensome, therefore, relief should not be granted as requested. These valves should be stroke time tested individually each cold shutdown in accordance with the Code requirements.

Supply System Response:

The surveillance procedure has been revised to require these valves to be stroke time tested individually at cold shutdown, which meets Code requirements. Acceptance criteria for these valves will be established after the test is conducted at the next cold shutdown or refueling outage.

14. The operability of the emergency diesel generator (EDG) is considered to be safety related. Due to the designed system redundancy, the diesel air start valves are not individually verified operable during routine EDG testing. Emergency diesel generator air start system valves perform a function important to safety and it is recommended they be included in the IST Program Plan and individually tested to the Code requirements.

Supply System Response:

The D.G. air start solenoid valves DSA-SPV-5A 1/2, 5A 1/4, 5A 2/2, 5A 2/4, 5B 1/2, 5B 1/4, 5B 2/2, 5B 2/4, 5C 1/1 and 5C 1/2 have been included in Revision 4 of the IST Program Plan. These valves are non-ASME and as such are not required to meet the requirements of ASME Section XI. These valves will be tested annually in accordance with plant approved procedures. The testing ensures the valves are tested individually. Note that two valves will be tested at a time but a failure of a single valve would be detected.

15. The following control rod drive system valves (typical of 185 valves) perform a function important to safety and should be tested in accordance with the guidelines of GL 89-04, Attachment 1, Position 7.

<u>Valve</u>	<u>Category</u>	<u>P&ID M528 Coord.</u>	<u>Function</u>
HCU-114	B	C-2	Check vlv to scram hdr
HCU-115	B	C-5	Charging wtr ck vlv
HCU-126	B	C-4	Drive water AOV
HCU-127	B	C-3	Withdraw AOV
HCU-138	B	C-4	Cooling wtr ck vlv

Supply System Response:

The preceding HCU valves (typical of 185 valves) do perform a function important to safety. These valves are non-ASME and as such are not required to be included in the IST program by the subject SER or by GL 89-04. However, because of their safety significance and because the new O&M Code will require these valves to be added to the IST program in the future, the subject HCU valves have been included in Revision 4 of the IST Program Plan. Alternative testing and frequency, as allowed by position 7 of GL 89-04, will be used for testing of these valves.

16. There appears to be some discrepancy between the P&ID and the valve test tables for valves CIA-V-104A & B. The P&ID, M556 F-9 and G-9, shows these valves as manual operated globe valves. The valve test tables indicate these valves are Category C check valves. The Code required testing differs depending on the type and Category of these valves. This discrepancy should be corrected and these valves should be tested in accordance with the applicable Code requirements.

Supply System Response:

The valve test tables, page 4.4-10 show these valves as .5" manual globe valves which is the same as the referenced P&ID. Therefore, no discrepancy exists.

17. The containment isolation valves, which are relief valves, listed in Section 9.b, page 4.4-56 of the WNP-2 IST Program Plan submittal, are categorized as A/C valves. Although these valves are being tested per IWV-3510, they should also be tested per IWV-3420 because of the containment isolation function they serve. Furthermore, containment isolation valves are required to be leak rate tested once every two years instead of once every five years. These valves should be leak rate tested in accordance with the applicable Code requirements.

Supply System Response:

Relief valves categorized as C (or AC) are required to be tested in accordance with IWV-3512. The last sentence of IWV-3512 reads: "Valves so tested are not required to be additionally leak tested in accordance with IWV-3420". The Code is quite clear on this subject and testing is not required.

18. The containment atmosphere control system valves CAC-TCV-4A and B appear to perform a function important to safety. If it is determined that they do, they should be included in the IST program and be tested to the applicable Code requirements.

Supply System Response:

The Supply System concurs that CAC-TCV-4A and 4B have a fail safe safety related function. These valves are tested at least once every 18 months during the skid performance test to ensure the valve cycles based on temperature. Each 18 months a channel functional test of the valve is performed based on the input of an electrical signal. These valves will not be added to the WNP-2 IST Program Plan since they are skid mounted and are tested with their associated equipment. The NRC has clearly stated in several O&M Committee meetings that skid mounted equipment does not have to be included in an IST Program Plan. The testing described above should also meet the intent of alternate testing described in the response to Question 110 of the Minutes of the Public Meetings on Generic Letter 89-04, dated October 25, 1989.

ATTACHMENT 3

CHECK VALVES NOT IN COMPLIANCE WITH GENERIC LETTER 89-04

1. RHR-V-41A and 41B (LPCI to RHR check valve)

Anomaly: Verification of full stroke to the open position by passing the maximum required accident flow through the valve quarterly.

Proposed Action: Requesting relief, RV-27, to test the valves during refueling outages.

2. RHR-V-46A, B, C (RHR pump minimum flow check valves)

Anomaly: Quantitative determination of flow through the valve to verify valve open position.

Proposed Action: There is no installed instrumentation to measure flow through these lines. Prolonged operation of these pumps on minimum flow in order to use clamp on flow measuring devices can result in pump damage or failure as prolonged operation on minimum flow is not recommended by the pump manufacturer. Presently these valves are verified open by qualitative indications of flow through the minimum flow lines. These check valves serve no real system function and the permanent removal of the valve internals during the next refueling outage is being evaluated.

3. SLC-V-33A and B (SLC pump discharge check valves)

Anomaly: Back flow testing of check valves quarterly.

Proposed Action: Requesting relief, RV-26, to test the valves during refueling outages.

4. SW-V-223A and B (Control room chilled water condenser to SW check valve)

Anomaly: Quantitative determination of flow through the valve to verify valve open position.

Proposed Action: Flow through these lines is controlled by temperature control valves SW-TCV-15A and 15B. Due to the lack of installed instrumentation, measuring flow through these valves provides no significant benefit for the effort required. These check valves serve no real system function and the permanent removal of the valve internals during the next refueling outage is being evaluated.