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 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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 UHRIG,R.E. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 SCHWENCER,A. Operating Reactors Branch 1

SUBJECT: Forwards info re check valve cycling in response to NRC
 791130 ltr.Valve program meets ASME Section XI code
 requirements except for specific relief requested.

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March 6, 1980
L-80-75


Office of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Schwencer:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Check Valve Cycling

The attached information is submitted in response to your letter of November 30, 1979. The attachment presents Florida Power & Light Company's interpretation of ASME Code requirements for testing of check valves.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/GG/cph

Attachment

cc: Mr. J. P. O'Reilly, Region II
Harold F. Reis, Esquire

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ATTACHMENT

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Check Valve Cycling

This attachment addresses the NRC Staff's position that full stroke testing of check valves is a requirement of ASME Code Section XI, 1974 Edition, Article IWV-3520(b), "CHECK VALVE TESTS, Exercising Procedure." There are two basic aspects of the NRC position:

- I. The NRC Staff has determined that flow is acceptable for demonstrating check valve disk position because the ASME Code recognizes flow rate (or lack thereof) as an established method for indirect evidence of disk position.
- II. The NRC Staff has determined that design flow, as used in the plant's licensing basis Safety Analysis, is required to pass through the valve, whereupon it may be assumed that the valve moved to a position (full-stroking) to fulfill its function.

Florida Power & Light Company (FPL) recognizes full stroke testing as a Code requirement. FPL programs have always included full stroke testing and have further provided a definition of "full stroke." Therefore, based on the acceptability of past FPL interpretations of the ASME Code, we do not apprehend the basis for the NRC Staff's position.

With specific regard to aspect I. of the NRC position, we agree that the Code provides for flow rate as an established method for indirect evidence of check valve disk position. However, the Code also provides for changes in system pressure or temperature as an established method for indirect evidence of check valve disk position. As a consequence, the following should be recognized:

- (A) IWV-3410 (b) (2), Exercising Procedure for Category A and B Valves, provides acceptable methods for observing the necessary disk movement [IWV-3410 (b) (1), full-stroke exercise] that reflects disk position, and which includes system pressure or temperature in addition to flow rate; whereas,
- (B) IWV-3520 (b), Exercise Procedure for Category C Valves (Check Valves), omits reference to those methods for full-stroke exercising of valves, but does refer to methods of confirmation that the disk moves promptly on or off its seat by (1) visual observation, (2) by an electrical signal initiated by a position indicating device, (3) by observation of appropriate pressure indications in the system, or (4) by other positive means.

With specific regard to aspect II. NRC position, Code Article IWV-3520 (b), "Check Valve Tests, Exercising Procedure", does not specify design flow, as used in the Safety Analysis, as a requirement to satisfy the full-stroke exercise of the valve.

The FPL valve program includes check valves with Category C and AC classifications. IWV-2110, Category of Valves, requires combination of categories, such as Category AC, to meet all the requirements of each individual category, as applicable.

It is the FPL position that our valve program meets ASME Section XI Code requirements, except for specific relief requested in accordance with 10 CFR 50.

