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March 21, 1990

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NP7-12
ISI Valve Test Relief Request

Gentlemen:

South Carolina Electric & Gas Company (SCE&G) hereby submits the attached request for relief from testing Residual Heat Removal (RHR) containment isolation valves XVG 08701 A/B at the frequency specified in the ASME Section XI Code. Upon approval of this relief request, SCE&G intends to test the valves to all of the code requirements except frequency, which will be as specified in 10CFR50, Appendix J. The ASME Code requires the valves to be tested every two years, whereas Appendix J requires a testing frequency of every 40 months.

In the "Reasons for Request" category of the SCE&G Relief Request, Reason 1) states that valves 8701 A/B are not required to be tested at the Type C Leak Rate frequency delineated in 10CFR50, Appendix J. Sections II.F. through II.H. of Appendix J categorize valves as Types A, B, or C for primary reactor containment leakage testing purposes. Per these sections, valves 8701 A/B are clearly Type A valves, which require, in paragraph III.D.1.a., three tests in ten years, or every 40 months.

These Type A valves are tested according to Paragraph III.a.1.d. which states that valves 8701 A/B "shall be tested in accordance with III.C." Section III.C. provides the methodology for testing Type C valves. Section III.C. does not provide testing frequencies because they are delineated, for all valve types, in Section III.D. Since valves 8701 A/B are Type A valves, they are subject to testing every 40 months per the requirements of III.D.1. Though the valves are tested according to Type C methodology, they are not Type C valves and are, therefore, not subject to testing at the Type C frequency.

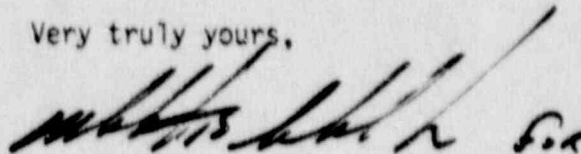
Additionally, Virgil C. Summer Nuclear Station Technical Specification 3.4.6.2, "Reactor Coolant System (RCS) Operational Leakage," requires that valves 8701 A/B be tested to ensure that the leakage at RCS operating pressure (2235 ± 20 psig) does not exceed 1 GPM. This test is performed on each valve during startup following each refueling outage, and prior to returning the valves to service following maintenance repair or replacement work.

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Because valves 8701 A/B are Category A valves in ASME Section XI classification, Paragraph IWV-3422 of the Code requires them to be tested at a frequency of every two years. The NRC Staff has stated in Generic Letter No. 89-04 that the leak test procedures and requirements for containment isolation valves specified in 10CFR50, Appendix J are equivalent to the requirements of Section XI, paragraphs IWV-3421 through IWV-3425. SCE&G is requesting relief from the Code required frequency and intends to test the valves at the frequency specified for Type A valves in 10CFR50, Appendix J.

In order to support the scheduling of activities for the upcoming outage at the Virgil C. Summer Nuclear Station, SCE&G requests the NRC response and approval of this request by April 3, 1990. Should you have any questions, please call at your convenience.

Very truly yours,



O. S. Bradham

EWR/OSB:lcd
Attachment

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File (810.19-2)

ISI VALVE TEST RELIEF REQUEST

Relief Request II: P.1. Revision 1

Components: Valves XVG08701A and XVG08701B

Code Category: A **Code Class:** 2

Function: These valves provide Residual Heat Removal (RHR) TRAIN "A" and RHR TRAIN "B" inside Reactor Building containment isolation. They are closed during normal operation and closed post accident.

Existing Test Requirement: Perform 10CFR50 Appendix J alternative Type A Leak Test in accordance with ASME Section XI code test frequency every two (2) years.

Alternate Test Frequency: As permitted by 10CFR50 Appendix J perform Type A alternative Leak Test method every 40 ± 10 months.

Reasons for Request: 1) These valves are not required to be Type C Leak Rate tested to the requirements, including frequency, of 10CFR50 Appendix J per II.H.1 thru II.H.4. The Leak Test requirements for these valves are included in 10CFR50 Appendix J III.A.1.d. The frequency specified for Leak Rate Testing through the plant Technical Specification is 40 ± 10 months. However, an additional Leak Rate Testing frequency requirement of every two (2) years exists for Code Category A valves. 10CFR50 Appendix J recognizes that these valves only require a Leak Test at the Type A frequency in lieu of the Type C frequency of every (2) years. Section 3.6.4 of the VCSNS Technical Specifications reflects this by stating that these valves are not subject to Type C Leak Testing. 2) The alternative test method, 30 Day Water Seal, is recognized by 10CFR50 Appendix J as an acceptable alternative to Type A and Type C testing for these valves. 3) This reduced frequency will result in a reduction of radiation dose of approximately 200 mr per refueling outage. 4) These valves are tested as Reactor Coolant System Pressure Isolation Valves each refueling outage per Technical Specification 3.4.6.2.