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VPNPD-93-082
NRC-93-048

April 2, 1993

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
PUMP AND VALVE INSERVICE TESTING PROGRAM
THIRD 10-YEAR PROGRAM SAFETY EVALUATION REPORT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated April 17, 1992, transmitted a Safety Evaluation Report (SER) prepared by the Office of Nuclear Reactor Regulation and an attached Technical Evaluation Report (TER) concerning our Inservice Test (IST) Program, Third 10-Year Interval. SER Section 5.0, "Evaluation," required that we address all items listed in TER Section 5.0, "IST Program Anomalies and Action Items," within one year of the date of the SER. The majority of these items were addressed in our previous letters of July 30, 1992 (VPNPD-92-271/NRC-92-085) and March 2, 1993 (VPNPD-93-054/NRC-93-031).

The purpose of this letter is to provide you with a complete list of all actions we have taken in response to the items listed in TER Sections 4.0 and 5.0. We consider the list of actions provided in this transmittal, as well as the actions discussed in our previous two letters, sufficient to fully address this matter.

In many cases our response to a specific action item has resulted in an IST Program change. These changes, as well as several resulting from recent plant modifications, are reflected in our latest revisions of the IST Program Document and IST Program Background Document. We are transmitting copies of the latest revisions of these two documents to you under separate cover.

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Should there be any questions regarding this correspondence, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Link".

Bob Link
Vice President
Nuclear Power

DEK/jg

Attachment

cc: NRC Resident Inspector
NRC Regional Administrator, Region III
Adele DiBiasio, Brookhaven National Laboratory

TER SECTION 4.0, COLD SHUTDOWN JUSTIFICATIONS

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- 4.01 Cold Shutdown Justification CSJ-22 dates back to the previous 10-year program interval and no longer is applicable. Valves 1SI-00878 A&C and 2SI-00878 A&C are currently being tested on a quarterly basis, as specified by the Code. Consequently, we have stricken CSJ-22 from our IST Program. The IST Program Document has been revised to reflect the fact that CSJ-22 is no longer active.
- 4.02 Cold Shutdown Justification CSJ-24 has been reevaluated and stricken from our IST Program. Valves 1SI-00826 B&C and 2SI-00826 B&C have been and are being tested on a monthly basis to fulfill Technical Specification requirements. This testing exceeds the quarterly testing required by Code. The IST Program Document has been revised to reflect the fact that CSJ-24 is no longer active.
- 4.03 Cold Shutdown Justification CSJ-17 was intended to apply to all main steam isolation valve (MSIV) air pilot vent valves (Units 1&2: MS-02017C-S, MS-02017D-S, MS-02018C-S, and MS-02018D-S). The concerns of TER Section 4.03, which refer to a typographical error in the valve numbers, have been corrected in the IST Program Document. Additionally, as part of our actions in response to TER Section 5.16, we have added MSIV air pilot supply valves (Units 1&2: MS-02017A-S, MS-02017B-S, MS-02018A-S, and MS-02018B-S) to the IST Program. CSJ-17 has been revised in our IST Program Document to include these supply solenoids as well as the original vent solenoids.

TER SECTION 5.0, IST PROGRAM ANOMALIES AND ACTION ITEMS

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5.01

The status of each program relief request has been reviewed and updated. The updated status format is designed to minimize any reader confusion. The status block of each request now indicates one of the following:

- a) When the request was submitted to the NRC for review and the transmittal document.
- b) NRC approval, or degree of approval, and the NRC SER which evaluates the request.
- c) When the request was withdrawn and the document transmitting the withdrawal notice.

5.02

The IST Program Introduction, Interpretation 1.1.3, was not intended to conflict with the requirements set forth in 10 CFR 50.55a(g). Since the interpretation as originally written inadvertently caused some reader confusion, it has been revised and the statement which caused the confusion removed.

5.03

The IST Program Document consists of a program description section, followed by several appendices. The program description section and each appendix are capable of being revised independently of one another to permit easy update. Consequently, the revision numbers associated with the various appendices and the description section may not necessarily match.

An index page is provided with the IST Program Document which shows the revision number in effect for each part of the document. However, the index page itself has a serial revision number which does not necessarily match the revision number on any of the appendices or the description section.

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This system of revision numbering is the reason why some sections of the IST Program Document in our original 10-Year program submittal had different revision numbers.

- 5.04 All requirements of ASME OMB-1989, Part 6, related to taking and evaluating vibration data are being met. Relief Request PRR-7 has been revised to reflect this condition.
- 5.05 PRR-9 has been revised to reflect the requirement for proceduralization of differential pressure calculations where corrections for liquid in gauge sensing lines is necessary. Any procedures which invoke PRR-9 properly proceduralize this calculation.
- 5.06 Instrumentation reviews have been completed for applicability of Relief Request PRR-10. As stated in our letter (VPNPD-92-355/NRC-92-135) of November 16, 1992, we are prepared to formally withdraw PRR-10 upon receipt of approval for Relief Request PRR-21 for our fuel oil transfer pumps, P-070 A&B.
- 5.07 Relief Requests PRR-17 and PRR-18 were formally withdrawn in our letter of March 2, 1993 (VPNPD-93-054/NRC-93-031). The IST Program Document has been updated to reflect the withdrawal of these relief requests.
- 5.08 As stated in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, we have completed the necessary modifications which allow us to withdraw Relief Request PRR-6. Formal notification of our withdrawal of PRR-6 was contained in that letter, and the IST Program Document has been updated to reflect the withdrawal of PRR-6.
- 5.09 In our letter (VPNPD-93-054/NRC-93-031) of March 2, 1993, we discussed modifications to the boric acid transfer system which enabled us to withdraw several relief requests associated with that system. In that letter we withdrew Relief Requests PRR-11,

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PRR-12, and VRR-26. The IST Program Document has been updated to reflect the withdrawal of these relief requests.

- 5.10 The calculation used to obtain service water pump inlet pressure is proceduralized within the test procedure. The requirement for proceduralization of the calculation has been incorporated into relief request PRR-13.
- 5.11 In our letter (VPNPD-93-054/NRC-93-031) of March 2, 1993, we discussed the completion of modifications to the ESF HVAC system. In that letter we formally withdrew relief requests PRR-15 and VRR-31. The IST Program Document has been updated to reflect the withdrawal of these relief requests.
- 5.12 As discussed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, we have completed modifications which permit the withdrawal of relief request PRR-3. Formal notice of our withdrawal of relief request PRR-3 was given in that letter, and the IST Program Document has been updated to reflect this notification.
- 5.13 Section 4.2 of the IST Program Document has been revised to correctly reference Section XI paragraphs IWV-3400, IWV-3500, and IWV-3600. The legend for the IST Program Document Valve Tables has been updated to reference paragraph IWV-2100 for valve categories.
- 5.14 Section 4.4 of the IST Program Document and Relief Request VRR-2 have been revised to call for check valve full-stroke exercising in accordance with the provisions of Generic Letter (GL) 89-04, Attachment 1, Position 1.
- 5.15 Test requirements for Category A valves have been reviewed and revised where necessary to call for testing which measures specific leakage rates. This eliminates any conflict with Section XI paragraph IWV-3420 concerning leak rate testing of Category A valves.

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- 5.16 The explanation of the "BT-PV" test requirement has been changed to state, "Exercise test of pneumatic pilot valve. Test is performed in conjunction with the associated main valve test." The test procedures used to test each MSIV also perform an independent trip check on each of the four associated pilot valves. Failure of any one pilot valve to properly actuate requires that the associated MSIV be declared inoperable, thus ensuring that each individual pilot valve is capable of performing its safety function.
- In addition, as stated above in our response to TER Section 4.03, the IST Program has been revised to include MSIV air pilot supply valves (Units 1&2: MS-02017A-S, MS-02017B-S, MS-02018A-S, and MS-02018B-S).
- 5.17 Note 1 of IST Program Appendices D and E has been revised as stated in the TER to eliminate reader confusion.
- 5.18 All solenoid and air-operated valves within the IST Program have been reviewed for applicability of fail-safe testing. All valves with fail-safe actuators have a fail-safe test requirement specified. Valves which are passive are so noted.
- 5.19 The emergency diesel generator fuel oil and air systems have been reviewed and all necessary components verified to be listed in the IST Program Document and Background Document. Specific valves called out in this TER section, FO-00014, FO-03922, FO-03930, and FO-03931, are appropriately listed in both documents. Valve FO-00085 is the normally open, manual isolation for the discharge pressure gauge associated with Fuel Oil Transfer Pump P-070B. This valve is not listed in either document since it is not within the IST Program scope.
- 5.20 See response to TER Section 5.11.

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- 5.21 All relief requests have been revised to specifically state applicable units and components.
- 5.22 See response to TER Section 5.21.
- 5.23 The SER of April 17, 1992, states that Relief Request VRR-22 is granted in accordance with 10 CFR 50.55a(a)(3)(i). We note that TER Section 5.23 has evaluated this request as not being required, but choose to maintain the request within our IST Program Document since relief has in fact been granted by the NRC.
- 5.24 As discussed in our letter (VPNPD-93-054/NRC-93-031) of March 2, 1993, we have withdrawn Relief Request VRR-28 associated with our auxiliary feedwater pump minimum flow valves. The IST Program Document has been updated to reflect this formal notice of relief request with-drawal.
- 5.25 As discussed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, open direction testing for all four auxiliary feedwater pump minimum flow valves has been added to the IST Program Document, and testing will commence upon completion of modifications. Specific valves called out in this TER Section, AF-00114 (Units 1&2), AF-00115 (non-unit specific), AF-00116 (non-unit specific), and AF-00117 (non-unit specific), are appropriately listed in the IST Program Background Document.
- 5.26 As stated in our letter (VPNPD-93-054/NRC-93-031) of March 2, 1993, we have withdrawn Relief Request VRR-19 following removal of Valves CV-00300 A&B (Units 1&2) from our IST Program. The IST Program Document has been updated to reflect this formal notice of relief request withdrawal.
- 5.27 Relief Request VRR-24 specifically states that testing of the CV-00351 (Units 1&2) check valves during cold shutdowns (non-refueling) would result in the intro-duction of an excessive amount of boric acid in to the reactor coolant system, thus making

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subsequent reactor start up difficult. This relief request was listed as an open item by the SER, and has been revised and resubmitted (VPNPD-93-054/NRC-93-031 dated March 2, 1993) to include additional information in the basis for relief to aid in review and subsequent regulatory approval.

Relief Request VRR-26 has been withdrawn as discussed in our response to TER Section 5.09.

5.28 As discussed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, Relief Requests VRR-8 and VRR-9 have been formally withdrawn. The IST Program Document has been updated to reflect these formal notices of relief request withdrawal.

Relief Request VRR-15 has been revised to fully describe the disassembly and inspection program in accordance with the guidance contained in GL 89-04, Attachment 1, Position 2.

Relief Request VRR-27 has been withdrawn as discussed in our letter of March 2, 1993 (VPNPD-93-054/NRC-93-031). The IST Program Document has been updated to reflect these revised requests.

5.29 See response to TER Section 5.28.

5.30 Relief Requests VRR-17 and VRR-25 have been revised to incorporate the requirement for a maximum limiting diesel start time and the requirement for alternating air motor banks during testing, such that the valves in each air bank are tested at least once each quarter. This satisfies the provisions for relief stated in the TER.

5.31 Relief Request VRR-21 has been revised and resubmitted, as discussed in our letter of March 2, 1993 (VPNPD-93-054/NRC-93-031).

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- 5.32 As discussed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, Relief Request VRR-34 has been formally withdrawn. The IST Program Document has been updated to reflect this formal notice of relief request withdrawal.
- 5.33 Relief Request VRR-2 has been revised to incorporate the additional requirement for a partial stroke of Check Valves SI-00845 A,B,E, and F during cold shutdowns where Technical Specification 15.4.16 tests (Event V) are also required. The IST Program Document contains this revised relief request, and this action satisfies the provisions for relief stated in the TER.
- 5.34 Relief Request VRR-4 was revised and resubmitted to the commission for review and approval in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992. We are currently awaiting a response to this revised request.
- 5.35 As discussed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, Relief Request VRR-6 has been formally withdrawn. The IST Program Document has been updated to reflect this formal notice of relief request withdrawal.
- 5.36 As discussed in our letter (VPNPD-93-054/NRC-93-031) of March 2, 1993, Relief Request VRR-20 has been formally withdrawn. The IST Program Document has been updated to reflect this formal notice of relief request withdrawal.
- 5.37 Relief Request VRR-23 was revised and resubmitted to the commission for review and approval in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992. We are currently awaiting a response to this revised request.

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- 5.38 Concerns noted in the commission's review of Relief Request VRR-5 were addressed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992. These concerns have been incorporated into VRR-5, which is in our revised IST Program Document.
- 5.39 The IST Program Background Document discusses the lack of any shut direction stroke testing for SI-00891 A&B (Units 1&2). As discussed in the above response to TER Section 5.28, Relief Request VRR-27 has been withdrawn.
- 5.40 The IST Program Background Document discusses the lack of stroke testing for SI-00859 A&B (Units 1&2), the containment spray pump minimum flow line check valves. (Note: TER Section 5.40 erroneously designates these valves as SI-00849 A&B.)
- 5.41 The analysis utilized by the reviewer in TER Section 3.8.1.1 is correct. Although the valve numbers for RM-03200AA (Units 1&2) do not appear on the drawings with these valves, the functional description of these valves makes the possibility of mistaking them for any other virtually impossible. Valve numbers will be added to the drawings in question during a future revision.
- 5.42 As discussed in our letter (VPNPD-92-271/NRC-92-085) of July 30, 1992, Relief Request PRR-4 has been formally withdrawn. The IST Program Document has been updated to reflect this formal notice of relief request withdrawal.
- 5.43 As discussed in our letter (VPNPD-92-115/NRC-92-034) of March 24, 1992, Relief Request PRR-5 has been formally withdrawn. The IST Program Document has been updated to reflect this formal notice of relief request withdrawal.

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5.44

Although several pump related relief requests may make mention to using a data point pump curve, no pump curves are currently utilized for Code required testing at Point Beach. However, in some instances it has been useful to employ multiple reference points as is permitted in IWP-3112. All references to use of a pump curve for Code required testing have been removed from the relief requests in question. This should eliminate any further confusion on this matter.