



TU ELECTRIC

Log # TXX-93142
File # 10010
905.4
Ref. # 10CFR50.55a(g)

April 29, 1993

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
UNIT 1/UNIT 2 INSERVICE TESTING PLAN FOR
PUMPS AND VALVES

REF: 1) TU Electric Letter logged TXX-92302
from Mr. William J. Cahill, Jr. to the NRC,
dated July 2, 1992

2) TU Electric Letter logged TXX-93080
from Mr. William J. Cahill, Jr. to the NRC,
dated February 4, 1993

Gentlemen:

Enclosed is Revision 2 to the Comanche Peak Steam Electric Station (CPSES) Unit 1 and 2 Inservice Testing Plan for Pumps and Valves in the first interval. The Plan is a combined Unit 1/Unit 2 Plan, implementing the same requirements from the ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition of Section XI on Units 1 and 2. The effective date of this revision is April 30, 1993.

As discussed in Reference 1, implementation of the Combined Plan on Unit 1 will be phased-in and completed before return to power following the third refueling outage for CPSES Unit 1 (1RF03). A portion of the Combined Plan will be considered implemented when the appropriate surveillance procedure has been approved and the surveillance successfully performed. Until it is phased out before returning to power from 1RF03, the current Unit 1 IST Program Plan will remain in effect. Implementation status will be tracked by the CPSES engineering support group.

The Unit 2 portion of the Plan was implemented upon issuance of the Unit 2 operating license by the NRC.

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400 N. Olive Street L.B. 81 Dallas, Texas 75201

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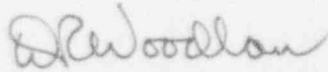
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The attachment provides a detailed description of the changes made by Revision 2 to the Combined Plan in a format identical to that provided for changes to the Final Safety Analysis Report (FSAR). All changes described in the attachment have been evaluated for relative significance (i.e., the group number 1, 2, 3 or 4 corresponds to each change justification as discussed in TU Electric letter TXX-88467 dated June 1, 1988). In addition, all changes applicable to CPSI Units 1 and 2 have been reviewed under the TU Electric 10CFR50.59 process and found not to include any "unreviewed safety questions."

If you have any questions, please call Mr. Carl Corbin at (214) 812-8859.

Sincerely,

William J. Cahill, Jr.

By: 
D. R. Woodlan
Docket Licensing Manager

CBC/grp
Attachment
Enclosure

c - Mr. J. L. Milhoan, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR
Mr. G. Bynog

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(as amended)

Group Description

-
- 4 Removes the "Note to Reviewers and Users" page following the cover sheet of the IST Plan.
Editorial :
This note has become obsolete since the approval in August 1992 of the change to 10CFR50.55a endorsing the use of the 1989 Edition of ASME Section XI. (Reference: 57 FR 34666, August 6, 1992.) As noted on the bottom of this page, this note is not part of the Inservice Testing Plan; discussion of its removal is included for information only.
Change Request Number : IT-93-2.1
Commitment Register Number :
Related SER : 3.9.6 SSER :23 3.9.6
SER/SSER Impact : No
- 1-1 3 Revises Section 1.2, Code Edition and Addenda, to remove the proviso for NRC staff approval of the use of the 1989 Edition of ASME Section XI for the inservice testing of CPSES Unit 1 and to remove statement re: Unit 2 use of 1989 Edition of ASME Section XI.
Update :
Approval (for Unit 1) was granted by the NRC staff in a safety evaluation dated January 29, 1993. Compliance with appropriate codes (for both units) is addressed in the first sentence of Section 1.2. This change is trivial in nature.
Change Request Number : IT-93-2.2
Commitment Register Number :
Related SER : 3.9.6 SSEK :23 3.9.6
SER/SSER Impact : No
- 1-2 3 Revises Section 1.3, Dates of Test Interval, to indicate that the effective dates of the first inservice test intervals for Unit 1 and Unit 2 are the 120 month periods beginning with the issuance of the operating license for each unit.
Revision :
It was anticipated that the NRC staff would, as part of their review of the IST Plan, approve the original wording of Section 1.3 which sought to place Unit 1 and Unit 2 on the same 120 month inservice test interval commencing with the issuance of the Unit 2 operating license. The NRC staff did not approve the use of this proposed test interval for Unit 1; therefore, Section 1.3 is revised to reflect the test interval requirements of 10CFR50.55a(f)(4). This change is trivial in nature and makes the IST Plan consistent with the safety evaluation dated January 29, 1993, NUREG-0797

CPSES - INSERVICE TESTING PLAN (IT)

AMENDMENT / REVISION 2
DETAILED DESCRIPTIONAttachment to TXX-93142
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Supplement SER 26, and 10CFR50.55a.
 Change Request Number : IT-93-2.3
 Commitment Register Number :
 Related SER : 3.9.6 SSER :23 3.9.6
 SER/SSER Impact : No

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|------------|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1-2 | 3 | <p>See Sheet No(s) :& 1-3 Adds text to Section 1.4, Approval Status. This section was reserved to record the NRC approval status of the IST Plan and its implementation. Update : NRC staff approvals were issued for the IST Plan and the IST Program by safety evaluation dated January 29, 1993 for Unit 1 and by NUREG-0797, SER Supplement 26 for Unit 2. This change notes the approvals as well as the areas/items not verified by the NRC staff. This change is trivial in nature, and makes the IST consistent with the safety evaluation and SSER. Change Request Number : IT-93-2.4 Commitment Register Number : Related SER : 3.9.6 SSER :23 3.9.6 SER/SSER Impact : No</p> |
| Table 0- | 3 | <p>See Sheet No(s) :3 and the Notes Section for Table 0 Revises the Fuel Oil Transfer Pumps' listings in the Code Class column of Table 0, Inservice Pump Testing Plan, from "3" to "(2)", and adds related Note to the Table. Correction : The Fuel Oil Transfer Pumps were not purchased as N-stamped ASME components, but were upgraded to "equivalent" ASME Code components through a qualification and testing program which is detailed in FSAR Section 9.5.4.3 and DBD-ME-215, Section 5.1.5. This change does not affect the testing requirements specified for the Fuel Oil Transfer Pumps. This change is trivial in nature and makes the IST Plan consistent with the FSAR and other design basis documents. Change Request Number : IT-93-2.5 Commitment Register Number : Related SER : 3.9.6 SSER :23 3.9.6 SER/SSER Impact : No</p> |
| Table VTI- | 4 | <p>See Sheet No(s) :1 Revises the Note at the bottom of Page 1 of the IST Plan Valve Table Index (VTI) regarding the classification of Category A valves. Clarification : This change clarifies the Plan by noting that in</p> |

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addition to the example of pressure relief devices cited in the Note, some check valves may also be subjected to seat tightness determination as a method of close exercise testing yet not necessarily be classified as Category A. This change is consistent with ASME Section XI, which allows seat leakage testing to be performed as a method of close exercise testing for check valves, regardless of their category. (Reference: OM Part 10, para. 4.3.2.4.a.) No valves are re-categorized (in the Valve Tables) as a result of this note change and no valve test requirements are affected. This change is trivial in nature.

Change Request Number : IT-93-2.6

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 1-

3

See Sheet No(s) :9 and the Notes Section for Table 1
Revises the Exercise Test column in Table 1,
Auxiliary Feedwater, for Valves HV-2480, -2481 &
-2482 from refueling outage frequency to quarterly
frequency ("MT/RF" to "MT/Q"). Also, deletes Note 2
(and reference to Note 2 within the revised column),
which justified deferring exercise testing to
refueling outages.

Revision :

Test procedures OPT-502A, Rev. 2 (for 1-HV-2480, 1-HV-2481, 1-HV-2482) and OPT-502B, Rev. 1 (for 2-HV-2480, 2-HV-2481, 2-HV-2482) no longer require the Auxiliary Feedwater System to be drained prior to exercising the subject valves. Therefore, the justification for deferring the exercise test for these valves from quarterly to refueling outages is no longer valid. This change is in accordance with ASME Section XI requirements, which require the Owner to determine the exercise test frequency for valves based on the practicality of test performance. (Reference: OM Part 10, para. 4.2.1.2.)

Change Request Number : IT-93-2.7

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 2-

3

See Sheet No(s) :5 & 6
Revises the Safety Function Position column in Table 2, Component Cooling Water, for LV-4500-1 from "O/C" to "O", and revises the Remarks column to reflect the change in the Safety Function Position column (deletes the word "isolation"). Also, revises this

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column for FV-4536 and FV-4537 from "O/C" to "C", and revises the Remarks column to reflect this change (deletes "CCW pump miniflow flowpath").

Revision :

DCN 4200, Rev. 0 revised DBD-ME-229, Component Cooling Water System, to indicate the active safety functions for valves LV-4500-1, FV-4536 and FV-4537. This change revises the IST Plan to reflect these safety functions. The net effect of this change is to delete the exercise testing requirement for these valves in the stroke direction in which they do not perform a safety function. This change is in accordance with ASME Section XI requirements, which requires the Owner to exercise valves to the position required to fulfill their safety function(s). (Reference: OM Part 10, para. 4.2.1.2.)

Change Request Number : IT-93-2.8

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 3-

3

See Sheet No(s) :1

Revises the Safety Function Position column in Table 3, Chilled Water (Safety), for HV-6720 from "O/C" to "O". Also, makes a related change in the Remarks column for the subject valve (deletes "isolation").

Revision :

DCN 4156, Rev. 0 revised DBD-ME-311, Safety Chilled Water System, to indicate the active safety function for valve LV-6720 as being open only. This change revises the IST Plan to reflect this safety function. The net effect of this change is to delete the exercise testing requirement for this valve in the closed stroke direction; this is the direction it does not perform a safety function. This change is in accordance with ASME Section XI requirements, which require the Owner to exercise valves to the position required to fulfill their safety function(s). (Reference: OM Part 10, para. 4.2.1.2.)

Change Request Number : IT-93-2.9

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 4-

3

See Sheet No(s) :6

Revises the Valve/Actuator Type column in Table 4, Chemical and Volume Control, for HV-8220 and HV-8221 from "GL/SO" to "GA/SO".

Revision :

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DCN 3974 changed 1-HV-8220 and 1-HV-8221 from solenoid operated globe valves to solenoid operated gate valves. DCN 3630 changed 2-HV-8220 and 2-HV-8221 from solenoid operated globe valves to solenoid operated gate valves. This change revises the IST Plan to reflect these design changes as shown in FSAR Figure 9.3-10, Sheet 3; and, therefore, makes the IST Plan consistent with the FSAR. No changes to testing requirements for these valves results from this change. This change is trivial in nature and makes the IST Plan consistent with the FSAR.

Change Request Number : IT-93-2.10

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 4-

3

See Sheet No(s) :9 and the Notes Section of Table 4 Deletes reference to Note 2 from the open Exercise Test column in Table 4, Chemical and Volume Control, for valves 8378A, 8378B, 8379A and 8379B, and replaces it with a reference to Note 8. Adds Note 8 to the end of the Table.

Revision :

Note 2 only addresses the close exercise testing requirements for the subject valves and is an inappropriate reference for open exercise testing requirements. Note 8 is added to restate the design basis that only one charging line is in service at a time (i.e., either the normal charging line or the alternate charging line). (Reference: DBD-ME-255, Section 4.3.1.2.1.3.) Note 8 also clarifies that the check valves in the out-of-service charging line do not need to be open exercise tested, as allowed by ASME Section XI. (Reference: OM Part 10 para. 4.3.2.5.) This change is trivial in nature and simply clarifies the IST Plan.

Change Request Number : IT-93-2.11

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 4-

3

See Sheet No(s) :11 and the Notes Section of Table 4 Deletes the nominal 10-year frequency requirement in the Exercise Test column in Table 4, Chemical and Volume Control, for Charging Pump Alternate Miniflow Valves 8510A and 8510B, and adds reference to Note 9 in its place. Adds Note 9 to the end of Table 4, stating the augmented exercise test frequency requirements of the subject valves.

Revision :

The NRC staff imposed augmented requirements

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regarding the inservice testing frequency for the subject valves via a safety evaluation dated January 29, 1993 for Unit 1 and NUREG-0797, SER Supplement 26 for Unit 2. This change to the IST Plan restates the requirements of the safety evaluation and SSER as required by 10CFR50.55a(f)(6)(ii) which requires licensees to follow augmented inservice test programs in cases where the NRC deems it to be necessary. This change is trivial in nature and revises the IST Plan so that it is consistent with the safety evaluation and SSER.

Change Request Number : IT-93-2.12

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 9-

3

See Sheet No(s) :1, 2, 3 & 4

Adds Steam Generator Atmospheric Relief Valve Isolation Valves MS-0026, MS-0063, MS-0098 and MS-0134 to Table 9, Main Steam, along with the appropriate description and testing requirements.

Revision :

LDCR# SA-92-666 revised FSAR Table 3.9B-10, Active Valves, to include the subject valves. This change revises the IST Plan to reflect that change to the plant design bases. This change is in accordance with ASME Section XI requirements, which require the Owner to include active valves in the IST Program and to test them according to the rules of OM Part 10. (Reference: OM Part 10, para. 1 and 2.)

Change Request Number : IT-93-2.13

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 11-

3

See Sheet No(s) :3 and the Notes Section of Table 11

Revises the Exercise Test column in Table 11, Residual Heat Removal, for RHR Train A & B Pump Discharge Crosstie Valves 8716A and 8716B from quarterly frequency to cold shutdown frequency, and adds a reference to Note 6. Adds Note 6 to the Table, which justifies deferring the exercise testing for these valves to cold shutdowns.

Revision :

IE Information Notice No. 87-01 was issued to alert all PWR facilities to the possibility of placing their plants outside their design bases during plant operation by closing certain valves in the RHR System for maintenance or testing. At the time that the Unit 1 and Unit 2 IST Plan was prepared, it was interpreted that the close (and open) exercise

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testing which was specified to be performed quarterly during plant operation for 8716A and 8716B would not place the plant outside its design bases.

It has subsequently been interpreted that closing these valves quarterly during plant operation may place the plant outside its design bases. This re-interpretation was undertaken partly due to the realization that most other utilities with similar designs do not exercise these valves quarterly during plant operation and partly due to the NRC staff's position in Information Notice No. 87-01.

This change to the IST Plan is in accordance with ASME Section XI requirements, which require the Owner to determine the exercise test frequency for valves based on the practicality of performing the test. (Reference: OM Part 10, para. 4.2.1.2.)

Change Request Number : IT-93-2.14
Commitment Register Number :
Related SER : 3.9.6 SSER :23 3.9.6
SER/SSER Impact : No

Table 11-

4

See Sheet No(s) :Note 2

Adds text to IST Plan Table 11, Note 2 to indicate that the leak testing frequency requirements of Technical Specification 4.4.5.2.2 (which are specified in the IST Plan for reactor coolant pressure isolation valves) are more restrictive than the leak testing frequency requirements of OM Part 10, para. 4.2.2.3(a) which would otherwise apply.

Clarification :

This change clarifies existing testing requirements in the IST Plan. It explains that the apparent deviation from the ASME Section XI test frequency requirements regarding leak testing of reactor coolant pressure isolation valves results in a testing frequency more restrictive than the Code would otherwise require. This change is trivial in nature and simply provides clarification.

Change Request Number : IT-93-2.15
Commitment Register Number :
Related SER : 3.9.6 SSER :23 3.9.6
SER/SSER Impact : No

Table 13-

4

See Sheet No(s) :2

Changes the second listing in the Flow Diagram column in Table 13, Safety Injection, for 8804B from "M2-260" at location "(B-6)" to "M2-0262" at location "(B-4)".

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Editorial :
DCA 94877, Revision 1, relocated valve 2-8804B from flow diagram M2-260 at location B-6 to flow diagram M2-262 at location B-4. This change is trivial in nature and makes the IST Plan consistent with the flow diagrams, as revised.

Change Request Number : IT-93-2.16

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 13-

3

See Sheet No(s) :6, 7, 10, 11 & 12
Revises the Remarks column for valves 8823, 8824, 8825, 8843, 8881, 8888, 8890A and 8890B in Table 13, Safety Injection, to indicate that in addition to Containment Isolation, ECCS Flowpath Boundary is also a closed safety function for these valves.
Addition :
This change serves as a clarification of the previously identified closed safety function for the subject valves. This change does not affect the testing requirements already specified in Table 13 for these valves.

Change Request Number : IT-93-2.17

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 13-

4

See Sheet No(s) :Note 1
Adds text to IST Plan Table 13, Note 1, to indicate that the leak testing frequency requirements of Technical Specification 4.4.5.2.2 (which are specified in the IST Plan for reactor coolant pressure isolation valves) are more restrictive than the leak testing frequency requirements of OM Part 10, para. 4.2.2.3(a) which would otherwise apply.
Clarification :
This change clarifies existing testing requirements in the IST Plan. It explains that the apparent deviation from the ASME Section XI test frequency requirements regarding leak testing of reactor coolant pressure isolation valves results in a testing frequency more restrictive than the Code would otherwise require. This change is trivial in nature and simply provides clarification.

Change Request Number : IT-93-2.18

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 17-

4

See Sheet No(s) :1 & 2

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Revises the Flow Diagram column in Table 17, Misc. Containment Isolation Valves, for valves 2BS-0015, BS-0025, 2BS-0029, BS-0030, 2BS-0039 and 2BS-0040 to indicate the proper drawing coordinates. Also, the listings for 1BS-0202 & 2BS-0202, and 1BS-0203 & 2BS-0203 are combined and the proper flow diagram reference added for 2BS-0202 and 2BS-0203.

Editorial :

DCA 101105, Revision 4, revised flow diagram M2-0245 and in doing so relocated valves 2BS-0015, 2BS-0025, 2BS-0029, 2BS-0030, 2BS-0039 and 2BS-0040. DCA 101105 also added Sheet "A" to flow diagram M2-0245 to show valves 2BS-0202 and 2BS-0203 which were previously not shown on any flow diagram. This change reflects these changes made to the flow diagrams; is trivial in nature; and, simply revises the IST Plan editorially.

Change Request Number : IT-93-2.19

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 17-

- 4 See Sheet No(s) :8
Corrects Flow Diagram number for Containment Isolation Valves HV-4171, HV-4172, HV-4173 and HV-4174. Prior to this revision, there were duplicate listings for these valves (M1-0228 (B-3) & M1-0228 (B-3)). The second listing for each of these valves is changed to "M2-0228 (B-3)".

Correction :

These corrections are trivial in nature, and simply revise the IST Plan editorially.

Change Request Number : IT-93-2.20

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

Table 17-

- 3 See Sheet No(s) :9, 10 & 11 and Notes for Table 17
Revises the Function column in Table 17, Misc. Containment Isolation Valves, for valves HV-5536, HV-5537, HV-5538, HV-5539, HV-5540, HV-5541, HV-5542, HV-5543, HV-5562 and HV-5563 from "P" (Passive) to "A" (Active), and adds the appropriate active valve test requirements in the Exercise Test and Fail Safe Test columns. Also, adds Note 8 to the end of Table 17 to provide justification for deferring the exercise test for the subject valves to cold shutdowns.

Revision :

The subject valves were originally classified as Passive in the Unit 1 and Unit 2 IST Plan based on

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preliminary information that the valves were to be re-classified in the plant design bases from Active to Passive. (Reference: Technical Evaluation 92-604.) Upon further study and subsequent to the issuance of the IST Plan, it was decided to not re-classify the valves. (Reference: Technical Evaluation 92-2165.) This change to the IST Plan is required to recognize the Active classification for these valves and to identify the necessary active valve test requirements.

The note added explains the deferral of the exercise test for the subject valves to cold shutdowns. These valves cannot be full or part-stroke exercised during plant operation because they have not been demonstrated capable of closing during a LOCA or steam line break accident. Consequently, Technical Specification 3.6.1.7 requires these valves to be locked closed during plant operation to ensure that excessive quantities of radioactive materials will not be released via the Containment Ventilation System.

These changes are in accordance with ASME Section XI requirements, which require the Owner to identify and categorize all valves in the scope of the inservice testing program and to identify the tests to be performed and the schedule for testing. (Reference: ASME BPV Section XI, Appendix F, Supplement 4 and OM Part 10, paras. 2 and 3.6.)

Change Request Number : IT-93-2.21

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

A-4

3

See Sheet No(s) :-7, -9, -11, -13, -15, -17 & -19
Updates Appendix A of the IST Plan to indicate the
NRC approval status for each relief request.

Update :

Various NRC staff approvals were issued for the IST Plan and the IST Program by safety evaluation dated January 29, 1993 for Unit 1 and by NUREG-0797, SER Supplement 26 for Unit 2, including specific approvals/denial for each relief request contained in Appendix A. These changes to IST Plan Appendix A reference these approvals/denial, and makes the IST Plan consistent with the safety evaluation and SSER.

Change Request Number : IT-93-2.22

Commitment Register Number :

Related SER : 3.9.6 SSER :23 3.9.6

SER/SSER Impact : No

COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 & 2
INSERVICE TESTING PLAN FOR PUMPS AND VALVES
FIRST INTERVAL

INSTRUCTION SHEET
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The following instructional information and checklist is being furnished to help insert Revision 2 into the Comanche Peak Steam Electric Station IST. A description of this revision is provided in TXX-93142, dated April 29, 1993.

Discard the old sheets and insert the new sheets, as listed below. Keep all instruction sheets in the front of the Effective Page Listing to serve as a record of changes.

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COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 & 2
INSERVICE TESTING PLAN FOR PUMPS AND VALVES
FIRST INTERVAL

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