

# Duquesne Light Company

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

**Subject: Beaver Valley Power Station, Unit No. 2**  
**Docket No. 50-412, License No. NPF-73**  
**Updated Inservice Testing Program, Issue 1, Revision 11**

The purpose of this submittal is to provide the Nuclear Regulatory Commission (NRC) with an informational copy of revisions to the Beaver Valley Power Station Unit 2 (BVPS-2) Inservice Testing (IST) Program.

Enclosure 1 provides a summary of the IST program changes which have been incorporated into Revision 11.

Enclosure 2 is Issue 1, Revision 11 of the BVPS-2 IST Program. It has been determined that the IST program changes do not require NRC approval prior to implementation. This determination was made because all of the changes are either:

- editorial in nature, or
- in compliance with the 1983 Edition through Summer 1983 Addenda of the ASME XI Code, or
- in compliance with the positions delineated in Attachment 1 of Generic Letter No. 89-04, "Guidance on Developing Acceptable Inservice Testing Programs."

If you have any questions regarding this submittal, please contact Steve Sovick at (412) 393-5211.

Sincerely,

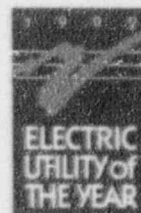
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*J. D. Sieber*  
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Enclosures

cc: Mr. L. W. Rossbach, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. G. E. Edison, Project Manager

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ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV. 11)

1. In the "Pump Testing Requirements" section (pages 3 and 4), the paragraph concerning the general use of pump curves was deleted and replaced with a new paragraph dealing with utilization of pump curves including seven (7) guidelines provided by the NRC. This was done in response to the NRC disapproving the general use of pump curves in the SER for Proposed Revision 1D of the BVPS-1 IST Program and as recommended by the NRC in approval of Proposed Revision 2B-REVISED of the Unit 2 IST Program.
2. Added new Section III (pages 37 - 67), "Pump Minimum Operating Point (MOP) Curves" to the BVPS-2 IST Program to be consistent with the BVPS-1 IST Program (revised due to Unit 1 Technical Specification Amendment No. 171). This section contains a graphical representation of the minimum allowable pump flow versus head, which is required to meet the applicable safety analysis for each pump in the BVPS-2 IST Program.
  - a) Added a second paragraph on page 5 of Section I, "Pump Testing Requirements" section referring to the new Section III on MOP curves.
  - b) Included MOP curves for the following pumps in Section III of the BVPS-2 IST Program (these MOP curves were already approved by the Station via an EM and/or by incorporation into an OST/BVT):

[2CHS*P21A]	[2RHS*P21B]	[2RSS*P21D]	[2FWE*P23B]
[2CHS*P21B]	[2SIS*P21A]	[2CCP*P21A]	[2SWS*P21A]
[2CHS*P21C]	[2SIS*P21B]	[2CCP*P21B]	[2SWS*P21B]
[2CHS*P22A]	[2RSS*P21A]	[2CCP*P21C]	[2SWS*P21C]
[2CHS*P22B]	[2RSS*P21B]	[2FWE*P22]	
[2RHS*P21A]	[2RSS*P21C]	[2FWE*P23A]	
  - c) MOP curves for the following pumps are still being developed by the Engineering Department and will be provided in a future BVPS-2 IST Program revision:

[2QSS*P21A]	[2QSS*P24A]	[2EGF*P21A]	[2EGF*P21C]
[2QSS*P21B]	[2QSS*P24B]	[2EGF*P21B]	[2EGF*P21D]
3. On the "Pump Testing Outline" sheets for Quench Spray Pumps [2QSS\*P21A and B] (pages 16 and 17), referenced an additional flow indicator [2QSS-FIS102A and B] in the "Comments" columns that could be used for measuring pump flowrate. This was done as a result of a recommendation made to 20ST-13.1 and 2 to allow use of either flow indicator during pump testing.
4. Referenced in the "Remarks" section of the "Pump Testing Outline" sheets for Component Cooling Water Pumps [2CCP\*P21A, B and C] (pages 24, 25 and 26) to "See RR7 (Pump Curve)". This was done to reference incorporation of Pump Relief Request No. 7 (pages 73 and 74) as approved by the NRC in Proposed Revision 2B-REVISED.

ENCLOSURE 1 (continued)

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV. 11) (continued)

5. Referenced in the "Remarks" section of the "Pump Testing Outline" sheets for Service Water Pumps [2SWS\*P21A, B and C] (pages 30, 31 and 32) to "See RR8 (Pump Curve)". This was done to reference incorporation of Pump Relief Request No. 8 (pages 75 and 76) as approved by the NRC in Proposed Revision 2B-REVISED.
6. Added additional "Basis for Relief" to Pump Relief Request No. 7 (page 73) as follows: "This could result in heatup of the Reactor Coolant Pumps to near required manual pump trip setpoints which could ultimately result in a plant trip".
7. Added to the "Alternate Test" paragraph of Pump Relief Request Nos. 7 and 8 (pages 74 and 76), "A pump curve (developed per the guidelines in Section I, "Pump Testing Requirements") will be used to...". This was done to reference utilization of pump curves as discussed above in Item No. 1, and, as committed to the NRC in our response to the SER for Proposed Revision 1D of the BVPS-1 IST Program and as recommended by the NRC in approval of Proposed Revision 2B-REVISED of the Unit 2 IST Program.
8. Better defined a full-stroke time in the second paragraph under Item "A" in the "Valve Testing Requirements" section (page 78) as follows: "Full-stroke time is that time interval from initiation of the actuating signal to the end of the actuating stroke".
9. Deleted similar paragraphs 2.e (page 79) and B.5 (page 81) in the "Valve Testing Requirements" section dealing with corrective actions to be taken for valve stroke time testing and check valve cycling: "If the valve is not covered by any Technical Specifications and the conditions of the valve cannot be corrected within 24 hours, then the valve shall be declared inoperable per ASME". This statement was deleted as recommended by the NRC in the BVPS-1 IST Program SER since it applies to BVPS-2 as well.
10. Added Seal Water Heat Exchanger Relief Valve [2CHS\*RV382B] to the IST Program (page 90) as required by LER 93-004.
11. Added partial forward stroke testing of RWST to HHSI Pump Suction Check Valve [2SIS\*27] at cold shutdowns per 2OST-1.10 to the IST Program (page 98). Also added additional "Basis for Relief" to Relief Request No. 5 (page 196) stating such. This was done to be consistent with NRC recommendations to the IST Program and the relief request for the same check valve at BVPS-1.
12. changed the frequency for reverse flow testing Chemical Injection Pump Discharge Header Check Valves to the Quench Spray System [2QSS\*303 and 304] (page 112) from quarterly to cold shutdown per new Cold Shutdown Justification No. 34 (page 175).

ENCLOSURE 1 (continued)

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV. 11) (continued)

13. Deleted Steam Generator Blowdown Sub-cooling Isolation Valves [2BDG\*AOV103A and B] from the IST Program (page 134) since these valves are no longer safety related. These valves were downgraded to QA Category II by TER 6260 as OSC approved at Meeting BV-OSC-45-92 on 11/12/92 with an associated safety evaluation.
14. Updated the referenced tests for stroking of Control Room Cooling Coil Inlet Isolation Valves [2SWS\*142] (page 138) and [2SWS\*143] (page 139) from 20ST-30.4 and 5 respectively to 20ST-47.3A(3B).
15. Updated the referenced tests for forward stroking of Service Water Pump Vacuum Break Check Valves [2SWS\*486] and [2SWS\*487] (page 140) to 20ST-30.2(6) and 20ST-30.3(6) respectively. Also revised the "Alternate Test" paragraph of Cold Shutdown Justification No. 48 to reflect the same (page 184).
16. Deleted SWS Pump Seals Strainer Outlet Check valves [2SWS\*697 and 698] (page 140) from the BVPS-2 IST Program. The internals to the check valves were removed by a temporary modification which is to ultimately be made permanent by a TER.
17. Updated the referenced test for cycling Main Steam Valve Area Cooler Check Valves [2SWS\*1103] and [2SWS\*1104] (page 140) from 20M-54, Log I4-39 to "Log I4-40".
18. Revised the "Basis for CSJ" for CCS H/X Service Water Headers Isolation Valves [2SWS\*MOV107A-D] in Cold Shutdown Justification No. 47 (page 183).
19. Added additional supplemental information to Relief Request No. 29 (page 222) for Reactor Vessel Head Vent Valves [2RCS\*SOV200A,B], [2RCS\*SOV201A,B] and [2RCS\*HCV250A,B] that enhances the relief request but does not change the "Basis for Relief" in which the NRC based their prior acceptance. (NRC was contacted on 6/23/93 and agreed prior NRC approval was not necessary).
20. Added to the list of "Rapid Acting Valves" in Relief Request No. 30 (page 223) Turbine Driven Auxiliary Feedwater Pump Steamline Isolation Valves [2MSS\*SOV105B] and [2MSS\*SOV105C] in the closed direction only. Addition of these valves to the relief request is approved per Generic Letter No. 89-04, Attachment 1, Item No. 6. Reference to "RR30" was also added in the "CSJ or Relief Requests" column on the "Valve Outline" sheets for both valves (page 126).
21. The following changes are editorial in nature:
  - a) Corrected the flow indicator descriptions and mark numbers referenced for LHSI Pumps [2SIS\*P21A and B] on the "Pump Testing Outline" sheets (pages 14 and 15).

ENCLOSURE 1 (continued)

SUMMARY OF CHANGES TO THE UNIT 2 1ST PROGRAM (REV. 11) (continued)

- b) Specified on the "Pump Testing Outline" sheets for the Auxiliary Feedwater Pumps [2PWE\*P22, 23A and 23B] (pages 27, 28 and 29) that bearing temperature requirements are obtained in the "monthly" test annually.
- c) Corrected the NSA position of [2SAS\*14] (page 145) from "Shut" (S) to "Locked Shut" (LS).
- d) Corrected a typographical error in the mark numbers for Control Room ACU Outside Air Dampers [2HVC\*MOD201A, B, C and D] and Control Room Emergency Outside Air Intake Dampers [2HVC\*MOD204A and B] (page 149) from MOV to "MOD".

ENCLOSURE 2