



GULF STATES UTILITIES COMPANY

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AREA CODE 504 835-8094 346-8051

December 21, 1993
RBG- 39796
File Nos. G9.5, G9.42

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

River Bend Station - Unit 1
Docket No. 50-458

Gentlemen:

Gulf States Utilities Company filed a license amendment request on November 18, 1993 (RBG-39425), to revise applicable Technical Specifications (TS) for a one-time only extension related to valve leak rate testing. Subsequent conversations with your Staff has provided a basis for an administrative revision to the previous request. This revision proposes a change to Surveillance Requirement (SR) 4.4.3.2.2 which will provide consistency between the TS intervals and the intervals provided in the River Bend Station Inservice Test Program. The revision also proposes a change to the phraseology of the note addressing the one-time only extension of the surveillance intervals for SR 4.6.1.3d and SR 4.6.1.3f.

Attachment 1 to this letter provides discussion and justification for the proposed revision to the Technical Specifications as shown in Attachment 2. The proposed revision provided herein is bounded by the no significant hazards consideration and environmental impact appraisal of our November 18, 1993 submittal and is considered administrative for that reason.

As stated in our November 18, 1993 submittal, the Technical Specifications revisions noted in that submittal and as revised in this submittal are required prior to February 7, 1994, in order to avoid a unit outage solely to conduct these surveillance tests.

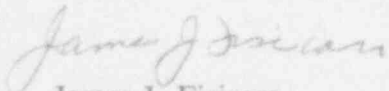
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If you have any questions or comments, please contact Mr. Leif L. Dietrich of my staff
at (504) 381-4866.

Very truly yours,



James J. Fisicaro
Manager, Safety Assessment and
Quality Verification

Attachments

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cc: U. S. Nuclear Regulatory Commission
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NRC Resident Inspector
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Mr. Edward T. Baker
U.S. Nuclear Regulatory Commission
M/S OWFN 13-H-15
Washington, D.C. 20555

Department of Environmental Quality
Radiation Protection Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
Attn: Administrator

ATTACHMENT 1

GULF STATES UTILITIES COMPANY
RIVER BEND STATION
DOCKET 50-458/LICENSE NO. NPF-47

VALVE LEAK RATE TESTING
REVISION TO ORIGINAL SUBMITTAL
(93-11)

DOCUMENT INVOLVED: Technical Specifications

ITEMS: Surveillance Requirement 4.4.3.2.2
Surveillance Requirement 4.6.1.3d
Surveillance Requirement 4.6.1.3f

REASON FOR REQUEST:

This revision to Gulf States Utilities (GSU) Company's original submittal dated November 18, 1993 (RBG-39425) concerning proposed changes to the cited River Bend Station (RBS) Technical Specifications (TS) addresses suggestions from the Nuclear Regulatory Commission (NRC) Staff. The revision will i) provide consistency with and allow flexibility provided by the American Society of Mechanical Engineers (ASME) Code as incorporated in the RBS Inservice Test (IST) Program in the leak rate testing intervals of the pressure isolation valves (PIVs), and ii) provide an editorial revision to the note acknowledging the one-time extension of the valve leak rate testing for 10 CFR 50, Appendix J Type C tests, and Main Steam - Positive Leakage Control System (MS-PLCS)/Penetration Valve Leakage Control System (PVLCS) valve inleakage testing.

As stated in the previous submittal, GSU will make a good faith effort to conduct these surveillance tests on the required TS interval if an outage of sufficient duration occurs. In order to perform the above surveillance tests, the plant must be in a shutdown condition. To require the plant to shut down solely to perform surveillance tests would cause an unnecessary thermal transient on the plant and result in additional radiation exposure to personnel. Should the proposed changes not be granted by February 7, 1994, GSU will be forced to implement an unplanned outage during this operating cycle.

DISCUSSION:

At the suggestion of the NRC Staff, TS 4.4.3.2.2 is proposed to be revised to allow the leak rate testing activities for the PIVs to be performed in accordance with the RBS IST Program. This will negate the need for extension of the surveillance interval as previously requested by allowing the valves to be tested on the frequency specified by the ASME Code.

Technical Specification SR 4.4.3.2.2 currently requires the PIVs, which provide isolation of safety systems from the reactor coolant pressure boundary, to be leak tested pursuant to Specification 4.0.5 including paragraph IWV-3427(B) of the ASME Code and verifying leakage of each PIV to be within the specified limit:

- a. At least once per 18 months, and
- b. Prior to returning the valve to service following maintenance, repair or replacement work on the valve which could affect its leakage rate.

Technical Specification 4.0.5 provides the requirements for inservice inspection and testing of ASME Class 1, 2, and 3 components, including the PIVs. Section XI of the ASME Boiler and Pressure Vessel Code requires leak testing of valves on a 'refueling outage' interval basis (i.e., when the unit is shut down for refueling), or following any maintenance, repair or replacement work which may affect the valves's leakage rate. There is no reference in the ASME Code for a specific time period for a 'refueling outage' interval. The RBS IST Program incorporates the ASME Code requirements, but, based on the TS, the valve testing is conducted on an 18-month interval. In that the requirements of the TS and ASME are redundant, and that the interval for leak testing contained in the RBS IST Program is as prescribed by the ASME Code, the imposition of the 18 month interval and the reiteration of the ASME Code requirements for maintenance, repair, or replacement activities is not necessary. Specifying the leak rate activities to be conducted per the RBS IST Program, as suggested by your Staff, is proposed. In addition, the proposed change to TS SR 4.4.3.2.2 is consistent with the recommendations provided in NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR/6", September 1992. This will also negate the need for extension of the surveillance interval as previously requested by allowing the valves to be tested on the frequency specified by the ASME Code.

With regard to the editorial revision of the note previously requested to be added for TS SR 4.6.1.3d and 4.6.1.3f, that note, as proposed, stated:

This testing may be performed during the refueling outage following the fifth cycle, scheduled to begin April 16, 1994.

At the suggestion of the NRC Staff, this note is proposed to be editorially revised to state:

A one-time schedular extension has been granted to allow this test to be performed during the refueling outage following the fifth cycle, scheduled to begin April 16, 1994.

REVISED TECHNICAL SPECIFICATIONS

The requested revisions to Technical Specifications 4.4.3.2.2, 4.6.1.3d, and 4.6.1.3f from those previously proposed on November 18, 1993 (RBG-39425) are shown in Attachment 2. The purpose of the revision is unchanged from that previously presented; i.e., the revision provides extension of the presently stated intervals to allow the surveillance testing to be performed during the fifth refueling outage scheduled to begin April 16, 1994. However, the change to TS 4.4.3.2.2 will not be a one-time only change but rather a change for the life of the plant.

NOTIFICATION OF STATE PERSONNEL

A copy of this supplement to the November 18, 1993 (RBG-39425) amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Radiation Protection Division.