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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 13**

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 13.

Enclosure 2 is Issue 1, Revision 13 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 Mr. Nelson R. Tonet at (412) 393-5210.

Sincerely,



George S. Thomas

Enclosures

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

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**ENCLOSURE 1**

Beaver Valley Unit 2 IST Program

Issue 1, Revision 13

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.13)

- 1) Revised the shape of the Minimum Operating Point (MOP) Curve for the "C" Component Cooling Water Pump [2CCP\*P21C] (page 57), based on a recent pump curve change. The MOP was not changed.
- 2) Revised all references to 2OST-11.14 to be 2OST-11.14A and 2OST-11.14B. Testing of the Low Head Safety Injection Pumps and Check Valves will be in 2OST-11.14A, and testing of the High Head Safety Injection Pumps and Check Valves will be in 2OST-11.14B versus both being done in 2OST-11.14 (pages 7-9, 14, 15, 87, 97-101, 195-199, 201-202). This was done to make this rather large test more manageable.
- 3) Deleted Charging Pump Miniflow Discharge Header Isolation Valve [2CHS\*MOV373] (page 90) from the BVPS-2 IST Program. Since this valve is Category B/P (passive) and is now de-energized open to meet NRC Branch Technical Position ICSB 18 (to prevent spurious closing of safety related MOV's), it no longer requires a remote position verification per the ASME XI Code. Because there is no longer any testing requirements for this valve, it has been removed from the BVPS-2 IST Program as documented in the IST Program Basis Document. (ref: LER 2-94-002)
- 4) Revised the test referenced for remote position verification (RPV) of [2SIS\*HCV868A and B] (page 102) from 2OST-11.14 to 2OST-1.10. The test conditions needed to RPV these valves did not "fit" well in 2OST-11.14 (SI Full Flow Test).
- 5) Deleted all references to 2BVT 1.21.1 (pages 124-126) since this test has been revoked. The Trevitest Method for Main Steam Safety Valve Setpoint Check (2BVT 1.21.2) will continue to be used to test all the Main Steam Safety Valves.
- 6) Added testing of Radiation Monitor (2MSS\*RQI101A,B,C) Discharge Isolation Valve [2MSS\*SOV120] (page 126) to the BVPS-2 IST Program. The valve was recently determined to have a containment isolation function to close and must also open on an SI signal. It was not previously included in the BVPS-2 IST Program because its opening function was determined not needed to mitigate an accident since several other means are available for determining a faulted steam generator (as documented in the IST Program Basis Document). It will be stroked and timed open and closed quarterly per 2OST-47.3A(3B). Radiation Monitor Discharge Isolation Valve [2MSS\*SOV120] was also added to Relief Request No. 30 (page 223) as a Rapid Acting Valve in both the open and closed directions as permitted by Generic Letter No. 89-04, Attachment 1, Item 6.
- 7) Corrected the referenced OM drawing number for [2SVS\*HCV104] (page 128) from 21-1 to 21-2.

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.13) (continued)

- 8) Per the revised response to QA Audit BV-2-93-01 (Observation No. 5), [2FWE\*HCV100A thru F] (page 131) will now be stroked and timed in 20ST-47.3A(3B) and deleted from 20ST-24.1.
- 9) Added (2SWS\*TCV101A,B) Bypass Valves [2SWS\*99 and 100] (page 135) and Control Room A/C Condenser (2SWS\*TCV101A,B) Outlet Isolation Valves [2SWS\*152 and 153] (page 138) to the BVPS-2 IST Program in response to SWOPI Team Audit Question PCS-6. These valves are normally throttled or open to support normal Control Room air conditioning, and must be able to be closed during an accident to ensure that sufficient SWS flow is provided to the backup Control Room cooling coils if normal Control Room cooling is lost. The valves will be stroked closed quarterly per 20ST-47.3A(3B).
- 10) Revised the full stroke reverse direction test referenced for [2SWS\*106 and 107] (page 136 and 182) from 20ST-30.8 to 20ST-30.8A or 8B per new issue of the OST.
- 11) Added Strainer Backwash Throttle Valves [2SWS\*115A and B] (page 137) to the BVPS-2 IST Program as recommended in NRC Information Notice 94-03 (Deficiencies Identified During Service Water System Operational Performance Inspections). The valves were already being stroked to the open throttled position quarterly per 20ST-30.17A and 20ST-30.17B.
- 12) Deleted Main Steam Valve Area Cooling Coil FCV's [2SWS\*FCV120A and B] (page 137) from the BVPS-2 IST Program. These valves are Category B/P (passive) and do not have any remote position indication; therefore since they no longer have any testing requirements, they have been removed from the BVPS-2 IST Program as documented in the IST Program Basis Document.
- 13) Revised the NSA position for CNMT Air Recirc Cooling Coils Inside/Outside CNMT Service Water Inlet/Outlet Isolation Valves [2SWS\*MOV153-1, 153-2, 154-1 and 154-2] (pages 138 and 139) from Shut (S) to Locked Shut (LS).
- 14) Added Service Water Chemical Injection Subsystem Check Valves [2SWS\*1166 and 1167] (page 140) to the BVPS-2 IST Program following permanent installation. These check valves have a function to close to prevent required Service Water flow from draining into the SWS valve pit should a pipe break of the 3" NNS Chemical Injection piping occur during an accident. A reverse direction test of the check valves will be performed quarterly per 20ST-47.3A(3B).

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.13) (continued)

- 15) Added Emergency Diesel Generator Starting Air Tank Excess Flow Check Valves [2EGA\*118, 119, 155 and 156] (page 146) to the BVPS-2 IST Program as recommended by the NRC during Check Valve Audit Inspection 94-09. These check valves were determined to have a function to close during an accident to prevent the Starting Air Tanks from blowing down and not being able to start and run the Emergency Diesel Generators. An excess flow closure test of the check valves will be performed quarterly per 20ST-47.3A(3B).
- 16) Revised the test method and reference test for Emergency Diesel Generator Compressor Discharge Check Valves to the Starting Air Tanks [2EGA\*100, 101, 130 and 131] (page 146) to closed only per 20ST-47.3A(3B). The past method of monitoring Starting Air Tank pressure per shift logs to verify the check valves were opening and closing was changed to a leak test to ensure check valve closure. The opening function was determined to not be required in an accident (as documented in the IST Program Basis Document) since the Air Compressors were Category II and the volume in the Starting Air Tanks alone was designed to start and run the Emergency Diesel Generators. A reverse direction test of the check valves will be performed quarterly per 20ST-47.3A(3B).

**ENCLOSURE 2**

Beaver Valley Unit 2 IST Program

Issue 1, Revision 13