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

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Potentially Invalid Leak Detection Tests Used as an Alternative for Required ASME, Section XI Hydrostatic Tests (Supplemental Report)

Attached is a system operability assessment for a portion of the Beaver Valley Unit 1 (BV-1) chemical and volume control system (CVCS) shown in Figure 1, which was not hydrostatically tested in accordance with ASME Section XI during the first Inservice Inspection Interval at BV-1. This system operability assessment supplements the CVCS operability assessment which was included in our May 3, 1990, submittal concerning potentially invalid leak detection testing.

During an Engineering review of the completed Instrumented Inspection Technique (IIT) Program and the subsequent impact on future ISI examinations, it was determined that a section of piping was incorrectly excluded from the examination procedures. A portion of the chemical and volume control system piping (2" CH-57-153WQ3) between the boric acid pumps and the charging pump suction line was considered non-safety related when evaluated against the criteria contained in the HAFA Topical Report. As such, this line was not included in the testing performed using the IIT methodology. Post test evaluations concluded this line is safety related.

We are currently evaluating all piping that was excluded from the IIT Program to determine if any additional piping should have been included. Each line determined to be incorrectly excluded from receiving an inservice inspection will be subjected to an operability assessment. If operability cannot be assured, we will follow the corresponding Technical Specification Action Statement. Additional piping identified in this category will be tested per ASME XI on a priority basis to a schedule consistent with our May 3, 1990 submittal.

The attached operability assessment has been reviewed by the Onsite Safety Committee.

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If you have anv questions, please contact Mr. Steve Sovick at (412) 393-5211.

Sincerely,

J. D. Sieber
Vice President
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Attachment

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. A. W. DeAgazio, Project Manager
Mr. R. A. McBrearty, NRC Region 1 Inspector

SUPPLEMENTAL

System Operability Assessment
for the BV-1 Chemical And Volume Control System

The portion of line 2" CH-57-153WQ3 that was not tested is considered to have maintained structural integrity and is functionally operable based on the following activities and surveillances:

- The line in question is schedule 40S rated at approximately 1100 psig. The shutoff head of the boric acid transfer pump is 100 psig and represents the maximum operating pressure to which the system will be exposed under normal and emergency operating conditions. Ample margin exists in the design of this line to accomodate operating pressures.

- This portion of the subject line is pressurized to normal system operating pressure during normal system arrangement.

- Normal plant tours by operations personnel are performed on a shift basis in the plant areas where this line is accessible. Any major pressure boundary leakage could, in conjunction with installed instrumentation, be detected during these tours.

- A leak in the subject line would result in a decreasing boric acid tank (BAT) inventory, which would be detected when the BAT level is determined each shift.

- The CVCS is a radioactive system, therefore, any major pressure boundary leakage would result in an increase in airborne radioactive activity which would be detected by various plant radiation monitors.

- All ASME Section XI pump and valve components in the CVCS are tested in accordance with the BV-1 Inservice Testing Program. The Inservice Testing Program assures the operability of the CVCS pumps and valves.

- Any CVCS pressure boundary leakage from 2" CH-57-153WQ3 would end up in either the primary auxiliary building or safeguards building sumps which would result in increased sump levels or sump pump out rate.

- Leakage examinations at operating pressure are performed on line 2" CH-57-153WQ3 periodically as required by ASME Section XI during the first two periods of the first 10 year interval. These examinations were performed by DLC personnel certified as VT-2 examiners.

Based on the above, the subject line has been determined to be structurally sound and functionally operable.

Corrective Action to be Taken

Hydrostatic testing of line 2" CH-57-153WQ3 will be performed during the current inspection interval per the requirements of ASME Section XI 83583 Code.

FIGURE 1
BORIC ACID SUPPLY LINE
LINE NUMBER 2" CH-57-153W-Q3