



Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

August 4, 1995
3F0895-04

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

Subject: Inservice Testing (IST) Program Safety Evaluation, Resolution of Anomalies

References: A. NRC to FPC letter, 3N0392-19, dated March 23, 1992
B. NRC to FPC letter, 3N0393-06, dated March 12, 1993

Dear Sir:

Attached please find a summary of actions taken by Florida Power Corporation (FPC) for the resolution of Inservice Testing (IST) Program Anomalies (Attachment 1). The anomalies were provided to FPC in references A and B. Revision 14 to the Crystal River Unit 3 (CR-3) IST Program is being provided in Attachment 2. This revision is provided in accordance with the 1983 Edition of the ASME Code, Section XI, Article IWA-1400(c), and the guidelines of Generic Letter 89-04. The revision reflects changes made in the program as a result of the development of the IST Basis Document. It includes several revised relief requests. The relief requests were revised to close the anomalies identified during the Staff's review of our IST Program; to incorporate changes that resulted from the development of the IST Basis Document; and other miscellaneous technical and editorial changes.

FPC is confident that the information provided in this submittal would bring to closure the actions identified by the Staff during their review of the CR-3 IST Program.

Sincerely,

P. M. Beard Jr.
Senior Vice President
Nuclear Operations

PMB:LVC
Attachments

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager

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CRYSTAL RIVER ENERGY COMPLEX • 15750 W. Power Line Street • Crystal River • Florida 34428-6708 • (904) 795-6486

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The following information addresses each item in Reference B, by summarizing the actions to be completed, and stating the resolutions (when required) to be performed by FPC. In addition to the relief requests revised for resolution of the anomalies, relief requests V-191 and V-360 were also revised. A summary is provided in this attachment. Changes to relief requests have been indicated with vertical bars in the margin.

NRC Item No. 1

Relief Request V-030

Action to be completed

The licensee will revise this relief request to explain that the only method to perform a part-stroke exercise would be to initiate flow through the check valves which would result in spraying the reactor building. The licensee would clarify that the disassembly and inspection procedures for these valves require verification of proper reassembly.

FPC Actions for Resolution

The relief request has been revised to clarify why partial stroke testing of these check valves is impractical and to clarify that the disassembly and inspection procedures for these valves require verification of proper reassembly.

Relief Request V-080

Action to be completed

The licensee stated that part-stroke testing of valve CHV-95 after disassembly and inspection will be documented in the relief request in addition to the valve table.

FPC Actions for Resolution

The relief request was revised to document that CHV-95 is part-stroke tested subsequent to disassembly and inspection. Table 1 also contains that information.

Relief Request V-120

Action to be completed

The Licensee should include in the relief request why does exercising of BSV-150 and BSV-151 resulting in mixing of Sodium Hydroxide with borated water makes the test impractical. The licensee will implement (in midcycle outage 9M, early 1993) a modification involving the installation of tri-sodium phosphate baskets in the reactor building sump and will decommission the NAOH tank, thus, IST requirements would no longer apply.

FPC Actions for Resolution

Subsequent to receiving Reference B, the Sodium Hydroxide Storage Tank and associated piping and components have been removed from service by MAR 88-05-01-02. The motor operated block valves, BSV-11 and BSV-12, have been closed and power removed. BSV-150 and BSV-151 no longer have an active safety function. Therefore, Relief Request V-120 has been withdrawn.

Relief Request V-200

Action to be completed

The licensee committed to conduct at least a partial stroke following reassembly and inspection as discussed in Generic Letter 89-04, Position 2. No further action is required.

FPC Actions for Resolution

FPC has addressed the concerns of the anomaly and no further action is required.

NRC Item No. 2

Relief Request V-113

Action to be completed

The licensee has addressed the concerns of the anomaly.

FPC Actions for Resolution

FPC addressed the concerns of the anomaly, therefore, no further action is required.

NRC Item No. 3

Relief Request V-129

Action to be completed

The licensee stated that part-stroke exercise of CFV-2 and CFV-4 is performed during cold shutdown outages. This procedure is also used following reassembly of the applicable valve. The licensee has addressed the concerns of the anomaly.

FPC Actions for Resolution

Although no specific actions were requested, the relief request has been revised to indicate that valves CFV-2 and CFV-4 will be partial stroke exercised following disassembly and inspection.

NRC Item No. 4

Relief Request V-220

Action to be completed

The Licensee did not provide information to address the reasons why closure verification by testing is impractical. The Licensee has not indicated that the valves (MSV-55, MSV-56) will be full stroke tested following reassembly.

FPC Actions for Resolution

The relief request has been revised to provide reasons why closure verification by testing is not practical, and to clarify that full stroke testing will be performed following reassembly.

Relief Request V-221

Action to be completed

The Licensee did not provide information to address the reasons why closure verification by testing is impractical. The Licensee has not indicated that the valves (MSV-186, MSV-187) will be full stroke tested following reassembly.

FPC Actions for Resolution

The relief request has been revised to provide the reasons why closure verification by testing is not practical, and to clarify that full stroke testing will be performed following reassembly.

May 24, 1990 letter

Action to be completed

The Licensee should provide basis for removing the valves (BSV-1 and BSV-8) closure verification from the IST Program. The previous revision did not state why prevention of backflow of Sodium Hydroxide into the decay heat pump suction headers is no longer important to safety.

FPC Actions for Resolution

The closure verification for BSV-1 and BSV-8 was removed by Revision 13 of the Pump and Valve Program because engineering analyses determined the maximum sodium hydroxide dilution potential of the Decay Heat injection stream had no affect on plant or core safety and that BSV-1 and BSV-8 have no closed safety function.

Subsequent to receiving Reference B, the Sodium Hydroxide Storage Tank and associated piping and components was removed from service by MAR 88-05-01-02. The motor operated block valves, BSV-11 and BSV-12, have been closed and power removed. The issue of sodium hydroxide dilution of the Decay Heat injection stream is no longer a valid concern.

NRC Item No. 5

Relief Request V-330

Action to be completed

It appears that the Licensee intends to conform with the requirements of the Code rather than to rely in the relief request.

FPC Actions for Resolution

FPC had previously addressed the concerns of the anomaly, no further action is required.

NRC Item No. 6

Action to be completed

Revision 13 of the IST Program states that valves DHV-33 and DHV-36 are disassembled and inspected for closure verification. The Licensee was investigating the option of replacing these valves with check valves that have external position indication.

FPC Actions for Resolution

Although no further action is required for this Item, the other options investigated for closure verification of DHV-33 and DHV-36 have not produced a more viable option than disassembly and inspection per the guidance of Generic Letter 89-04. Therefore, disassembly and Inspection will be continued as the method for closure verification of DHV-33 and DHV-36.

Relief Request V-191

This relief request was revised to correct an inadvertent omission that closure verification for these check valves (MUV-1, MUV-7 and MUV-11) is performed by disassembly and inspection on a sampling basis as provided by Generic Letter 89-04. The justification for this technique versus back-flow testing was specified in the relief request, however, due to a typographical error, the statement of the alternate examination was omitted.

Relief Request V-360

The relief request has had additional components added for which the exemption is requested. This relief request involves use of alternate methods of remote position verification for "can" solenoid operated valves other than by direct observation. Subsequent to the submittal and approval of this relief request, NUREG 1482 was issued, and in accordance with Section 4.2.5 of the NUREG, this relief is no longer required provided the provisions on OM-10 paragraph 4.1 are followed. This relief request has been revised only to maintain consistency in the IST Program Manual.

ATTACHMENT 2

CR-3 PUMP AND VALVE PROGRAM MANUAL

REVISION 14