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March 9, 1984

Director
Office of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Status of Request for Relief from the Requirements
of Section XI of the ASME Boiler and Pressure Vessel Code

With our letter dated December 22, 1983 we submitted the Inservice Inspection and Testing Program for the second ten-year interval at the Prairie Island Nuclear Generating Plant. 10 CFR Part 50, Section 55.55a(g) requires this program to conform to the latest NRC approved edition and addenda of Section XI of the ASME Code unless relief has been granted by the Commission.

The program submitted on December 22, 1983 contained a number of requests for relief from the requirements of Section XI of the Code. Many of these requests for relief had been previously reviewed and approved by the Commission when the Inservice Inspection and Testing Program for the first ten-year interval was reviewed. The program for the first ten-year interval was originally submitted on February 1, 1978 and was revised several times to incorporate NRC Staff comments, reflect newly discovered conflicts with the Code, and include new plant equipment.

The purpose of this letter is to summarize the status of our requests for relief from the requirements of the Code and clarify for the Staff which items require additional review and Staff action. It should be noted that much of the material submitted on December 22, 1983 does not require Staff action. This material was provided only for the information of our Licensing Project Manager and other interested members of the Staff. We believe that the program manual we have assembled, which very clearly shows which components are inspected and tested as well as all identified departures from the requirements of the Code, is a valuable resource document. Regulations require only the submittal of new or revised requests for relief.

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As noted in our letter of December 22, 1983, three completely new requests for relief were identified when the new program document was assembled. These new requests for relief were numbered 66, 67 and 68. As a result of NRC review of our previous program or Code changes, a number of requests for relief were withdrawn. The status of all requests for relief is summarized on the attached table.

As noted on the Table, all requests for relief included in our current program have been approved by the NRC Staff with the following exceptions:

Request for Relief Number	Actions Remaining
4	NRC Staff review of this item was completed on 1/31/84. Our program will be revised to include additional NRC requirements described in the supplemental SER.
5	The required valve internals inspections have been completed with no degradation detected. Our current program specifies a five-year re-inspection interval based on the results of this initial inspection. This interval was left unresolved in the 1/4/83 NRC Staff SER. See the attached table showing inspection results.
8	Reactor Coolant System vent valves (a TMI Action Plan modification completed on both units) were added to this request for relief subsequent to NRC Staff approval on 1/4/83. The proposed alternative testing meets NRC requirements as noted on the attached summary.
9	NRC Staff review of this item was completed on 1/31/84. Our program will be revised to include additional NRC requirements described in the supplemental SER.
10	This request will be withdrawn in accordance with the NRC Staff SER dated 1/4/83.
22	This request for relief will be withdrawn in accordance with the NRC Staff SER dated 1/31/84.
24	This request for relief will be modified to include only the diesel-driven cooling water pumps in accordance with the NRC Staff SER dated 1/31/84.

45	The NRC Staff SER dated 1/14/80 did not address the RHR heat exchangers (Class 2 components). This is believed to be an oversight. The basis on which other NRC Staff approval was granted also applies to this component.
59	The change in order of testing pressure isolation valves cannot be made as specified in NRC Staff SER dated 1/4/83 for one group of valves. We believe the alternative testing described in the attached figure is acceptable to the Staff.
66, 67, 68	New requests for relief

Also, as stated in Note (1) to the attached table, we do not believe that revisions to the Code which affect only the numbering of paragraphs cited in previously approved requests for relief require NRC Staff review and approval. We believe that in these cases the previous approval remains valid.

Except for the items we have noted, we believe the previous review remains valid for the new program. There have been no changes in the Code or in the installed plant systems which impact our requests for relief except as noted.

In summary, we believe that NRC Staff review is required only for the new requests for relief submitted with our December 22, 1983 letter (number 66, 67 and 68). In addition, to provide documentation of closeout of issues previously reviewed, the Staff may wish to address resolution of requests for relief 5, 8, 45, and 59.

Please contact us if you have any questions related to the information we have provided. We apologize for any inconvenience caused by the lack of clarity of our December 22, 1983 submittal.

David Musolf
Manager - Nuclear Support Services

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Attachment

c: J G Keppler
NRR Project Manager, NRC
Resident Inspector, NRC
G Charnoff

Attachments

Prairie Island Request for Relief Number	Applicability (Unit 1,2 or 1/2)	Date Relief Requested by NSP	Evaluated in NRC SER Dated	Request Approved	Remarks (notes 1,2,3,4)
1	1/2	9/15/78	1/4/83	YES	-
2	1/2	9/15/78	1/31/84	YES	-
3	1/2	9/15/78	1/31/84	YES	-
4	1/2	9/15/78	1/31/84	YES	Additional NRC Requirements Specified
5	1/2	6/8/79	1/4/83	YES	Valve Intervals Inspection Interval Unresolved
6	Withdrawn	-	-	-	-
7	1/2	9/15/78	1/4/83	YES	-
8	1/2	6/8/79	1/4/83	YES	RCS Vent Valves Added
9	1/2	9/15/78	1/31/84	YES	Additional NRC Requirements Specified
10	1	9/15/78	1/4/83	NO	Will be withdrawn
11	1/2	2/1/78	1/4/83	YES	-
12	1/2	9/15/78	1/4/83	YES	-
13	1/2	2/1/78	1/4/83	YES	-
14	1/2	9/15/78	1/4/83	YES	-
15	Withdrawn	-	-	-	-
16	1/2	2/1/78	1/4/83	YES	-
17	Withdrawn	-	-	-	-
18	1/2	2/1/78	1/4/83	YES	-
19	Withdrawn	-	-	-	-
20	Withdrawn	-	-	-	-
21	1/2	2/1/78	1/4/83	YES	-
22	1/2	4/19/83	1/31/84	NO	Will be withdrawn
23	1	2/1/78	1/4/83	YES	-
24	1	4/19/83	1/31/84	YES	Approved only for diesel CL pumps
25	1	9/15/78	1/4/83	YES	-
26	1	9/15/78	1/14/83	YES	-
27	1/2	9/15/78	1/14/83	YES	-
28	1/2	2/1/78	11/14/80	YES	-
29	1/2	2/1/78	11/14/80	YES	-
30	1	2/1/78	11/14/80	YES	-
31	1	2/1/78	11/14/80	YES	-
32	Withdrawn	-	-	-	-
33	1/2	9/15/78	1/4/83	YES	-
34	Withdrawn	-	-	-	-
35	1/2	6/8/79	1/4/83	YES	-
36	Withdrawn	-	-	-	-
37	Withdrawn	-	-	-	-
38	Withdrawn	-	-	-	-
39	1/2	2/1/78	1/4/83	YES	-
40	1	2/1/78	1/4/83	YES	-

Director of NRR, USNRC
March 9, 1984
Attachment

Request for Relief Number	Applicability (Unit 1,2 or 1/2)	Date Relief Requested by NSP	Evaluated in NRC SER Dated	Request Approved	Remarks (notes 1,2,3,4)
41	Withdrawn	-	-	-	-
42	1	8/26/83	12/28/83	YES	-
43	Withdrawn	-	-	-	-
44	Withdrawn	-	-	-	-
45	1/2	2/1/78	1/14/80	YES	Note 5
46	Withdrawn	-	-	-	-
47	Withdrawn	-	-	-	-
48	1/2	9/15/78	1/14/80	YES	-
49	Withdrawn	-	-	-	-
50	1/2	9/19/79	1/14/80	YES	-
51	Withdrawn	-	-	-	-
52	1/2	2/1/78	11/14/80	YES	-
53	Withdrawn	-	-	-	-
54	1/2	2/1/78	11/14/80	YES	-
55	Withdrawn	-	-	-	-
56	1/2	2/1/78	11/14/80	YES	-
57	1/2	9/15/78	1/4/83	YES	Note 6
58	Withdrawn	-	-	-	-
59	1/2	4/17/80	1/4/83	YES	Note 7
60	1/2	9/15/78	11/14/80	YES	-
61	1	6/8/79	11/14/80	YES	-
62	Withdrawn	-	-	-	-
63	1/2	6/24/83	10/12/83	YES	-
64	Withdrawn	-	-	-	-
65	Withdrawn	-	-	-	-
66	1/2	10/14/83	-	-	Note 8
67	1/2	10/14/83	-	-	Note 8
68	1/2	10/14/83	-	-	Note 8

Notes:

1) Revised code section numbers have been incorporated in the Relief Requests contained in the program manual for the second ten-year interval. No additional NRC review is believed to be necessary in these cases.

2) Additional NRC requirements or NSP commitments noted in NRC SER dated 11/14/80 were implemented with Revision 6 to the program manual for the first ten-year interval dated 7/31/81.

3) Additional NRC requirements or NSP commitments noted in NRC SER dated 1/4/83 were implemented with Revision 8 to the program manual for the first ten-year interval dated 4/19/83.

4) Relief requests will be modified in a future revision to the current program manual to include additional NRC requirements or NSP commitments noted in NRC Supplemental SER dated 1/31/84. See remarks column.

5) NRC Staff SER did not address RHR heat exchangers (Class 2). This is believed to be an accidental omission.

6) Required changes specified in NRC SER made in Revision 0 of program manual for the second ten-year interval.

7) NSP commitment to reverse order of testing for accumulator check valves has been revised. For SI-6-2, MV-32066, and SI-6-1 (and Unit 2 equivalents) this cannot be done. See the attached sketch and explanation.

8) Undergoing NRC review.

Request for Relief No. 5 - Check Valve Internals Inspections

The following inspections were performed as required by Request for Relief No. 5:

Check Valve Numbers	Description	Inspection Date	Results
CW-18-1	D2 Diesel Gen Cooling Water Supply Check	2/28/84	Good Condition
CW-18-4	D1 Diesel Gen Cooling Water Supply Check	8/2/83	Good Condition Tighten 1 bolt ¼ turn
CA-11-1	Caustic Add to 11x12CS Pumps	12/16/83	Good Condition
CS-18	11 Cntmt Spray Disch Check	12/11/83	Good Condition
CS-19	12 Cntmt Spray Disch Check	12/18/83	Good Condition
2CA-11-1	Caustic Add to 21 and 22 CS Pumps	9/24/83	Good Condition
CS-48	21 Cntmt Spray Disch Check	9/20/83	Good Condition
CS-49	22 Cntmt Spray Disch Check	9/26/83	Good Condition

Based on the results of these inspections (made following approximately ten years of operating service), we believe a 5-year re-inspection interval is appropriate as proposed in Request for Relief No. 5.

Request for Relief No. 8 - Reactor Coolant System Vent Valves

Unit 1 - SV-37035, 37036, 37037, 37038, 37039, 37049

Unit 2 - SV-37091, 37092, 37093, 37094, 37095, 37096

We believe cold shutdown exercising of these valves is not practical and that refueling exercising is appropriate.

As stated in our letter dated July 6, 1981:

> ASME operability testing of the vent system can be accomplished as required. However according to subsection IWV, valves shall be exercised once every 3 months unless it is not practical during plant operation. We do not believe it is practical to test these valves during plant operation, therefore the valve operability testing should be accomplished during refueling.

The Technical Evaluation Report (TER) accompanying the safety evaluation report issued by the NRC Staff on September 19, 1983 noted that a refueling interval surveillance was specified by NSP and found this acceptable.

During many cold shutdown conditions, the reactor coolant system will remain pressurized and the potential exists for some leakage through the system during this testing. Refueling interval testing will be done with the reactor coolant system depressurized.

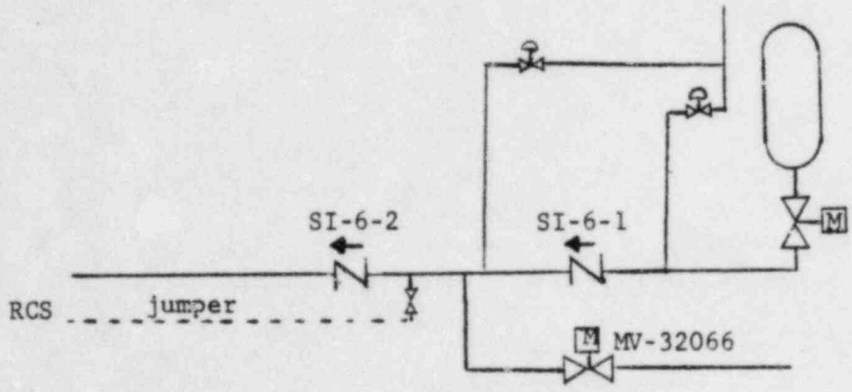
These values are used during routine fill and venting procedures following refueling and other cold shutdowns involving depressurization. This use of these valves helps assure their operability.

Request for Relief No. 59 - Revised Procedure

Page 3-4, 5 of NRC SER dated January 4, 1983 states that NSP has agreed to reverse the order of testing certain isolation valves.

We have revised the wording of the relief request to incorporate the desired order of testing (i.e., inboard or valves close to reactor coolant system should be tested last to minimize valve operation after leak testing). This cannot be accomplished for accumulator isolation valves, however, since Technical Specification Limiting Conditions for Operation (LCOs) require the accumulators to be operable under the plant conditions required for the valve tests.

This valve arrangement is tested in the following manner:



SI-6-2	is leak tested before placing accumulator in service
MV-32066 & SI-6-1	are leak tested by connecting a jumper between RCS & drain valve & monitoring change in ACC level & RHR pressure

The NRC Staff has requested us to test SI-6-1 and 32066 first, then SI-6-2. The back leakage of SI-6-2 can only be done by isolating the accumulator. We cannot isolate an accumulator when LCOs requires it to be in service.