



**GULF STATES UTILITIES COMPANY**

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775  
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February 11, 1992  
RBG- 36,488  
File Nos. G9.5, 224.600

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

Gentlemen:

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

Please find enclosed Gulf States Utilities Company's (GSU) Revision 5C of the River Bend Station (RBS) Pump and Valve Inservice Testing Program Plan for your review. This revision is in response to a teleconference between your Mr. D. Pickett and Ms. P. Campbell and GSU's L. Dietrich, W. Walling, et.al., on January 22, 1992, and supplements GSU's original response to the staff's safety evaluation report (SER) dated January 2, 1991. Additionally, this revision provides information and clarification for the Requests for Relief (RR) submitted in Revision 5 and supplemented with Revisions 5A and 5B, and provides one new RR for the staff's consideration.

As discussed with the staff in the January 22, 1991, teleconference, RRs PRR-2, PRR-3, PRR-4 and VRR-63 have been revised for clarity. RRs VRR-2, VRR-24, and VRR-29, were previously granted interim relief until January 31, 1992, and revision of these RRs continues. However, in order to obtain additional information to determine an accurate and complete alternate testing philosophy, GSU requests extension of the interim relief until January 31, 1993.

One new RR, VRR-64, which addresses extending the test frequency of the standby cooling tower inlet isolation valves is also included for your consideration. These valves will be affected by the RBS closed-loop service water system modifications, scheduled for completion during the fourth refueling outage, as discussed in the attached Request for Relief.

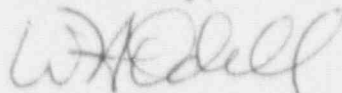
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GSU requests a response addressing the extension of interim relief for RRs VRR-2, VRR-24, and VRR-25, and the use of VRR-64, by March 13, 1992, in order to support the fourth refueling outage, scheduled to begin March 15, 1992.

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

Sincerely,



W.H. Odell  
Manager-Oversight  
River Bend Nuclear Group



LAE/LLD/MSF

Attachment

cc: U.S. Nuclear Regulatory Commission  
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NRC Resident Inspector  
Post Office Box 1055  
St. Francisville, LA 70775

Mr. D.V. Pickett  
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Rockville, MD 20852

Ms. P. Campbell  
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PUMP REQUEST FOR RELIEF NO. 2

SYSTEM: All systems listed in the pump program

COMPONENT: All pumps listed in the IST program

5B

CLASS: 2 & 3

FUNCTION: Safety Related

TEST REQUIREMENT: IWP-3230(b), if deviations fall within the Required Action Range of Table IWP-3100-2, the pump shall be declared inoperative and not returned to service until the cause of deviation has been determined and the condition corrected.

BASIS FOR RELIEF: River Bend's IST Surveillance Test Program is performed by Operations personnel. If a test value was taken and found to be in the Required Action Range, it would be checked unacceptable by personnel performing the test. The data package would then be given to the Shift Supervisor/Control Room Operations Foreman for their review of the test. He would then make a timely determination as to whether or not the data meets the requirements of Section XI and take all appropriate Tech. Spec. actions as required. Engineers would assist the SS/COF as necessary in making the determination as to whether or not ASME XI requirements were met.

5B

ALTERNATE TESTING: Determination of Required Action to be performed by Shift Supervisor/Control Room Foreman upon their review and signature during that shift period. Declaration of Required Action to coincide with Tech. Spec. Action Requirements.

5C

PUMP REQUEST FOR RELIEF NO. 3

DELETED

5C



PUMP REQUEST FOR RELIEF NO. 4

SYSTEM: All systems listed in the IST Pump Program

COMPONENT: All pumps listed in the IST Program

5B

CLASS: 2 & 3

FUNCTION: Various safety related activities

5B

TEST REQUIREMENTS: Per IWP-4120, the full-scale range of each instrument shall be three times the reference value or less.

5B

BASIS FOR RELIEF:

For pumps in the IST program, the plant installed instruments are often inoperative or out of calibration and are therefore not used for IST testing purposes. In these tests, the procedure requires the use of calibrated temporary M&TE. The M&TE comes in certain standard full-scale ranges (e.g. 0-15, 0-30, 0-60, 0-100, 0-150, etc.). Example: A problem occurs when trying to obtain the start-up and running inlet pressure. The start-up inlet reference value is 18 psig and the running inlet reference value is 60 psig. This would require the use of 2 gauges to meet IWP-4120 requirements. In another example a reference value is 31 psig, three times the reference value is 93 psig, the gauge available is 0-100 psig; therefore, the use of this gauge is not allowed by IWP-4120.

5B

5C

River Bend proposes the following allowances to IWP-4120: To use one gauge for pressure readings in lieu of attaching, using, and removing two separate gauges. In addition, to permit a 10% deviation in the full-scale range requirements to allow the use of a gauge which is within a 10% deviation of the full scale range requirements of IWP-4120.

5C

ALTERNATE TESTING:

- 1) Instrumentation (temporary or installed) to allow a 10% deviation in the full-scale range requirements of IWP-4120.
- 2) The use of one gauge to obtain measured pressure parameters when the static and running pressures differ requiring the use of 2 pressure gauges to fulfill IWP-4120.

5B

VALVE REQUEST FOR RELIEF NO. 63

(Cold Shutdown Justification)

<u>COMPONENT CATEGORY</u>	<u>FUNCTION</u>	<u>CLASS</u>
1SWP*MOV57A,B	Standby Service Water supply header isolation with Normal Service Water	3                      B
<u>TEST REQUIREMENT:</u>	Per IWV-3411 and IWV-3521, Category B valves shall be exercised at least once every three months.	5B
<u>BASIS FOR RELIEF:</u>	Stroke timing and exercise testing of these valves during cold shutdown would require a RHR loop to be inoperable which would result in a Technical Specification Limiting Condition for Operation and would disrupt Normal Service Water to operating equipment.	5C
<u>ALTERNATE TESTING:</u>	An exercise test for each valve during every cold shutdown and refueling outages during the plant conditions when the Service Water loads are minimal.	5C

VALVE REQUEST FOR RELIEF NO. 64

<u>COMPONENT</u>	<u>FUNCTION</u>	<u>CLASS</u>	<u>CATEGORY</u>
1SWP*MOV55A	Standby Cooling Tower Inlet	3	B
1SWP*MOV55B	Valves - Returns Standby and/or Normal Service Water to the Standby Cooling Tower	3	B

TEST

REQUIREMENT:

Per IWV-3411, IWV-3412, and IWV-3513, Category A and B valves shall be exercised, full stroke time tested at least once every three months.

BASIS FOR  
RELIEF:

Testing of these valves under the present system configuration, a common suction for Normal Service Water and the Circulating Water system from the Circulating Water Flume, has minimum effect on operation of the plant. These effects include minor chemistry changes (chlorine dilution) and the increase in level of the Standby Cooling Tower basin.

In Refuel Outage No. 4 to address corrosion problems, the existing system configuration will be modified by separating the Normal Service Water system from the Circulating Water system, and by closing the system to operate as a closed loop system. This will allow better chemistry control for the Service Water system. Due to a limited volume of water in the closed loop system, a potential for a plant transient is likely if a substantial quantity of water is being lost.

The new closed loop system includes a surge tank with a working capacity of approximately 30,000 gallons. The storage capacity was increased from 10,000 gallons to partially address the above problem. The original design included a 10,000 gallon surge tank to account for thermal expansion, some component draindown, and minor system leakage (less than 3 to 5 gpm). The makeup to the system is provided at a rate of about 100 gpm from the Demineralized Makeup Water system through a two inch line. There is also an additional six inch line that can supply makeup to the limit of the Demineralized Makeup Water pumps through a manual valve (about 350 gpm).

Given a flow rate of approximately 10,000 gpm through the open Standby Cooling Tower Inlet Valve, the additional surge capacity will provide approximately two minutes before the Normal Service Water system volume reduces to the point where operator action to shut down the plant would occur.

Additionally, the injection of the closed loop system chemistry into the Standby Cooling Tower will result in significant disposal consideration of the water being added to the Standby Cooling Tower basin each time the valves are tested.

The normal stroke time for opening and closing these valves is 30 seconds in each direction. The historical trends for the stroke times for the above valves have been very satisfactory.

ALTERNATE  
TESTING:

Based on the above reasons, the frequency to test the 1SWP\*MOV55A&B valves should be changed from the current 92 days to every refueling outage. This will minimize the impact of testing on plant operation as described above.