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November 16, 1992

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
PUMP AND VALVE INSERVICE TEST PROGRAM
PUMP AND VALVE RELIEF REQUESTS/COLD SHUTDOWN JUSTIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated May 28, 1992, transmitted Inspection Report 92008 (DRS) regarding the Point Beach Nuclear Plant Inservice Test (IST) Program. Paragraph 2c of that report recommended that we submit a relief request to address the fact that the Point Beach Nuclear Plant IST Program does not specifically include all plant components which are required to achieve a cold shutdown condition. Rather, our IST Program only requires the inclusion of those components which are necessary to achieve cold shutdown under accident conditions, which we consider to fall under the accident mitigation requirements of ASME Section XI.

Although only the scope statement for valve inservice testing (ASME Section XI-1986, IWV-1100, "Scope") specifically refers to components required for achieving cold shutdown, we interpret the scope statement for pumps (ASME Section XI-1986, IWP-1100, "Scope") to imply this requirement as well. We note that, in more recent revisions to the Code which apply to the inservice testing of pumps and valves (ASME OMa-1988, Parts 6 and 10, and later revisions), both pump and valve subsections outlining program scope require the inclusion of components required to achieve and maintain the cold shutdown condition. Consequently, the enclosed relief request has been written to apply to both pumps and valves, and has been assigned a dual reference number (PRR-22/VRR-36) so that it is included within our IST Program with both pump relief requests and valve relief requests.

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In addition to Relief Request PRR-22/VRR-36, at this time we are also submitting an additional Cold Shutdown Justification (CSJ-35) to document the need for an extended stroke testing frequency for two component cooling water valves, CCW-LW-63 and CCW-LW-64. As discussed in CSJ-35, quarterly stroke testing of CCW-LW-63 and CCW-LW-64 would require removal of both units' gas strippers from service, which would result in an undesirable increase in reactor coolant radioactivity levels.

Sincerely,

Bob Link
Vice President
Nuclear Power

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Enclosure

cc: NRC Resident Inspector
NRC Regional Administrator, Region III
Adele DiBiasio, Brookhaven National Laboratory

RELIEF REQUEST NO. PRR-22/VRR-36

SYSTEM: Non System Specific

COMPONENTS: Non Component Specific

FUNCTION: Not Applicable

SECTION XI REQUIREMENTS:

This subsection provides the rules and requirements for inservice testing to assess operational readiness of certain Class 1, 2, and 3 valves (and their actuating and position indicating systems) in light-water cooled nuclear power plants, which are required to perform a specific function in shutting down a reactor to the cold shutdown condition in mitigating the consequences of an accident or in providing overpressure protection (IWV-1100, "Scope").

ALTERNATE TESTING:

The Point Beach Nuclear Plant Inservice Test (IST) Program includes components (pumps and valves) which are required to perform a specific function in shutting down a reactor to the cold shutdown condition only where those components are utilized under accident conditions. Components which support achievement of cold shutdown under non-accident conditions, and which are not required to achieve cold shutdown following an accident, are not required to be included in the Point Beach Nuclear Plant IST Program.

BASIS FOR RELIEF:

The Point Beach Nuclear Plant Final Safety Analysis Report (FSAR), Chapter 14, "Safety Analysis," evaluates the safety aspects of either Unit 1 or Unit 2 of the plant, demonstrates that either or both units can be operated safely, and shows that exposures from credible accidents do not exceed the guidelines of 10 CFR 100. Given that these evaluations demonstrate that the Point Beach units can be operated safely and do not go beyond the plant achieving a hot shutdown condition in any scenario, specifically requiring the inservice testing of components which are required to achieve cold shutdown under non-accident conditions is unwarranted, and does not provide any increase in the level of program quality or safety to the public. Consequently, relief may be granted under either 10 CFR 50.55a(a)(3)(i), 10 CFR 50.55a(a)(3)(ii), or both.

STATUS:

Submitted to the NRC for review and approval November 16, 1992.

COLD SHUTDOWN JUSTIFICATION CSJ-35

SYSTEM: Radwaste Cooling Supply and Return Valves

COMPONENTS: CCW-LW-63 and CCW-LW-64

DRAWING: PBM-230

These normally open valves may be shut to isolate non-essential, non-class piping and components associated with the radioactive waste processing system from safety-related sections of the Unit 2 component cooling water (CCW) system.

Stroke testing these valves on a quarterly basis would force the shutdown of both units' gas strippers, which is undesirable when a unit is at power due to the resultant increased coolant activity levels. The increase in gaseous coolant activity would cause a corresponding increase in airborne radioactivity levels and personnel exposure should the reactor coolant system be vented for any reason before returning the gas strippers to service. Consequently, stroke testing will be performed during Unit 2 cold shutdowns of sufficient length, as described in ASME OMb-1989, Part 10, Subsection 4.3.2.2(c), "Exercising Requirements," when loss of the gas strippers has less impact on coolant gaseous radioactivity levels.