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Waterford 3

W3F1-92-0446
A4.05
QA

November 17, 1992

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Inservice Testing (IST) Plan - Pumps and Valves,
Revision 7, Change 3

Gentlemen:

Revision 7, Change 1 of the Waterford 3 Inservice Testing (IST) Plan - Pumps and Valves was submitted to the NRC by Entergy Operations, Inc. via letter no. W3F1-91-0468, dated September 3, 1991. This letter provides, by attachment, a revised relief request in accordance with specific instructions contained in the staff's letter dated August 19, 1992, which addresses the relief requests submitted in Revision 7, Change 1 of the IST Plan.

Section 3.2 of the staff's safety evaluation contained a basis for the denial of relief request 3.1.62 for the high pressure safety injection pump discharge safety valves. The revised relief request offers additional justification as to why these valves cannot be tested in accordance with code frequency requirements for valves designated as performing a safety function in both the open and closed position. Additional alternative testing is included to provide adequate verification of the required functions for these valves.

Given that the next quarterly surveillance is due to be performed in mid-January, Entergy Operations, Inc. respectfully request that this submittal be reviewed in an expeditious manner.

For your information, please note that Revision 7, Change 2 of the IST Plan was prepared but has not yet been implemented at Waterford 3, and therefore has not been submitted to the NRC.

A047
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If you have any questions concerning this submittal, please contact B.R. Loetzerich at (504) 739-6636.

Very truly yours,

RFB/BRL/ast
Attachment
cc: J.L. Milhoan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

Inservice Testing (IST) Plan - Pumps and Valves,
Revision 7, Change 3

3.1.62 Test Requirement

IWV-3521 requires that "check valves shall be exercised at least once every 3 months. . .". IWV-3522(a) requires that "Valves . . . whose function is to prevent reversed flow shall be tested in a manner that proves that the disk travels to the seat promptly on cessation or reversal of flow."

Basis for Relief

These valves perform a safety function in both the open and closed positions.

As previously discussed in the Basis for Relief for Relief Request 3.1.14, the operability testing (full-stroke) of these check valves' open safety function can only be accomplished by directing full HPSI pump flow into the RCS. No other flow path exists which could achieve the required HPSI pump flow rate. These valves cannot be full-stroke exercised during power operation because the HPSI pumps cannot overcome RCS pressure to provide flow into the RCS. Partial stroke exercising at power is possible through a flow path to the RWSP through a drain valve. However, the capacity of this flow path is insufficient to full stroke the subject check valves. During cold shutdown, the RCS is on shutdown cooling (SDC). Pressurizing the SDC system with full HPSI flow increases the possibility of low temperature, overpressure concerns. Therefore, the required flow can only be achieved during refueling outages, when the Reactor Vessel head is removed.

Since these valves can only be exercised to the full open position during each refueling outage, the requirement to verify that the disk travel to the seat from the open position can only be performed during each refueling outage.

Alternate Testing

These valves will be part-stroke exercised open and then verified to close quarterly.

These valves will be full-stroke exercised and then verified to close during each refueling outage.

Comments

Approval for Relief Request 3.1.14 granted per NRC SEP dated February 7, 1989. Upon receipt of approval of this Relief Request, this comments section will be updated to identify the approval document.

Valves

SI-207A SI-207B SI-207AB