



August 22, 1996

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555-0001

ULNRC-3421

Gentlemen:

**CALLAWAY PLANT**  
**DOCKET NUMBER 50-483**  
**INSERVICE INSPECTION PROGRAM PLAN**  
Reference: ULNRC-3377 dated May 22, 1996

This letter transmits a revision to Relief Request EN-02 of Revision 15 of the Callaway Plant Pump and Valve Inservice Test (IST) Program. The IST Program, which was transmitted by Reference 1, was developed to comply with the rules and regulations of 10CFR.50.55a and Section XI of the ASME Boiler and Pressure Code, 1989 Edition.

It was recently determined that valves ENV0003 and ENV0009, RWST to containment spray pump check valves, were not identified in the IST Program as requiring testing in the closed direction. Relief Request EN-02 currently allows testing by disassembly using grouping to satisfy the full stroke open requirement. As disassembly is permitted by the ASME Code to satisfy closed as well as open testing requirements, and grouping is authorized by Position 2 of Attachment 1 to Generic Letter 89-04, we believe we have the specific written relief from the Commission as required by 10CFR.50.55a(g)(6)(i) to implement this testing.

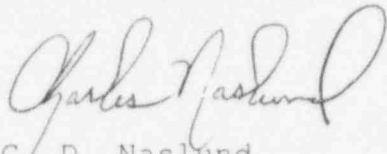
In keeping within the guidance provided in NUREG 1482, "Guidelines for Inservice Testing at Nuclear Power Plants", submittal of complete program revisions need only be made once every cycle or every other cycle unless major changes occur. For this reason, and to

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avoid introducing confusion during your review of the currently submitted Revision 15 of the IST plan, this relief request is submitted outside of a complete program revision. Please substitute the enclosed pages into Revision 15 currently under review.

If you have any questions concerning this information, please contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles D. Naslund".

C. D. Naslund  
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DSH/

Enclosures

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## EN-02

### RELIEF REQUEST

**VALVE:** ENV0003, 9

**CATEGORY:** C

**CLASS:** 2

**FUNCTION:** Valves open to provide flow from the refueling water storage tank to the spray headers. Valves close to prevent backleakage to the RWST.

**TEST REQUIREMENT:** Exercise check valve (full stroke open and closed) to the position required to fulfill its function every 3 months.

**BASIS FOR RELIEF:** These valves cannot be full stroke exercised open since the only full flow flowpath is to the spray headers which would result in spraying containment resulting in damage to lagging, non EQ electrical equipment, etc. These valves cannot be practically stroke tested closed, as plant design would require the installation of hoses and the use of a hydro pump or other plant equipment to serve as a pressure source. Additionally, per NUREG-1482 response to question group #24, "If a valve performs a safety function in both the open and closed positions, however, the Code requires that the valve be exercised to the open position and then verified to close". As discussed above, since open testing of these valves is satisfied by disassembly on a reactor refueling frequency, the closure test requirement of these valves will be satisfied by disassembly on a reactor refueling frequency as well.

**ALTERNATE TESTING:** ENV0003 and ENV0009 are Walworth Company Model 12-N-376-SP, 12" stainless steel check valves installed in a horizontal orientation that have the same service conditions as they are corresponding valves in the 'A' and 'B' trains of the Containment Spray System.

Exercise check valve (partial stroke) every 3 months. A different valve of this group will be disassembled, inspected, and manually full stroked at each refueling, until the entire group has been tested. If the full-stroke capability of the disassembled valve is in question, the remainder of the valves in this group will also be disassembled, inspected, and manually full stroked during the same refuel outage.

CALLAWAY NUCLEAR PLANT  
INSERVICE TEST PROGRAM

CONTAINMENT SPRAY SYSTEM (EN)  
DRAWING M-22EN01

VALVE NUMBER	DESCRIPTION	COOR	ACT.	VLV TYPE	VLV CAT.	VLV SIZE (in)	TESTS PERF/ FREQ.	SFTY POS	ACTIVE OR PASSIVE	RR OR TST DEF JUST.	NOTES
ENHV0001	CTMT RECIRC SMP TO CTMT SPRY PMP A HV	G-7	MO	GT	B	12	FS/CS PI/RF	O/C	ACTIVE	EN-4	
ENHV0006	CTMT SPRY PMP A DISCH HV	G-4	MO	GT	B	10	FS/Q PI/RF	O	ACTIVE		
ENHV0007	CTMT RECIRC SMP TO CTMT SPRY PMP B HV	B-7	MO	GT	B	12	FS/CS PI/RF	O/C	ACTIVE	EN-4	
ENHV0012	CTMT SPRY PMP B DISCH HV	B-4	MO	GT	B	10	FS/Q PI/RF	O	ACTIVE		
ENV0002	CTMT SPRY ISO VLV ENCAP A OUT CHECK	G-7	SA	CK	C	12	FS/SD	O	ACTIVE	EN-1	
ENV0003	RWST TO CTMT SPRY PMP A CHECK	G-7	SA	CK	C	12	FS/SD PS/Q	O/C	ACTIVE	EN-2	
ENV0004	CTMT SPRY PMP A DISCH CHECK	G-5	SA	CK	C	10	FS/SD PS/Q	O	ACTIVE	EN-5	
ENV0008	CTMT SPRY ISO VLV ENCAP B OUT CHECK	B-7	SA	CK	C	12	FS/SD	O	ACTIVE	EN-1	
ENV0009	RWST TO CTMT SPRAY PMP B CHECK	B-7	SA	CK	C	12	FS/SD PS/Q	O/C	ACTIVE	EN-2	
ENV0010	CTMT SPRY PMP B DISCH CHECK	B-5	SA	CK	C	10	FS/SD PS/Q	O	ACTIVE	EN-5	