

DUKE POWER COMPANY

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July 25, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555 (CN's 1-10)

Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Reference: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
IWP/IWV Pump and Valve Inservice
Testing Program Revision

Dear Mr. Denton:

Pursuant to 10 CFR 50.55a(g), enclosed for NRC staff use and review are ten copies of Unit 1 Revision 8 and Unit 2 Revision 4 (both dated July 25, 1985) to the McGuire Nuclear Station pump and valve inservice testing program. These revisions reflect changes to various alternate testing methods, incorporate additional requests for relief from code requirements, correct miscellaneous/typographical errors, and provide further clarification for certain relief requests. Justification for the revisions is as follows:

Pump Inservice Testing Program

- Stop recording flow for the Safety Injection (NI) pumps since they are in a fixed resistance system. Measuring NI pump flow would result in unnecessary personnel radiation exposure. [Units 1 and 2: pages I.1-1 and I.1-4].

Valve Inservice Testing Program

- Disassembly and full stroke exercising of auxiliary feedwater (CA), containment spray (NS), and safety injection (NI) system check valves CA-165 and CA-166, NS-21 and NS-4, and NI-248 and NI-249 will be performed on a rotating schedule during refueling outages. If one of these pairs of valves does not properly full stroke, the other valve will be disassembled and full stroke exercised. Disassembly of both check valves at each refueling would result in unnecessary manpower expenditures and personnel

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radiation exposure. Disassembly of check valves under similar system conditions on a rotating basis has been endorsed by the NRC. [Units 1 and 2: pages II.3-1 (new definition); II.6-6 and II.6-10 (CA valves); II.14-2, II.14-3 and II.14-5 (NS valves); and II.35-11 (Unit 2), II.35-12 (Unit 1) and II.35-31 (NI valves)].

- Clarification of how movement test/cycle timing of main steam isolation valves (MSIV's) SM-1, 3, 5, and 7, and MSIV bypass valves SM-9, 10, 11, and 12 are being performed. In addition, the current revisions relief request has been split into two separate relief requests, one for the MSIV's and one for the MSIV bypass valves. [Units 1 and 2: pages II.26-3 (MSIV's) and II.26-4 (MSIV bypass valves)].
- Miscellaneous/typographical errors [Units 1 and 2: pages II.31-15 (reactor coolant pump motors); II.31-16 (flow to the charging pump), (McGuire Unit 2 (Unit 2 page only)); II.37-2 and II.37-3 (addition of unit designation to steam generator blowdown recycle (BB) system valve numbers)].
- Deletion of Unit 1 safety injection system valves LNI-4A and LNI-5B from program. These valves have been deleted from the safety injection system as a result of the deletion (via installation of bypass piping) of the Unit 1 boron injection tank. (Note: the boron injection tank on Unit 2 was removed prior to licensing of Unit 2, consequently there are no corresponding valves in the current Unit 2 program). [Unit 1 only: page II.35-2].
- Change cycling interval of Unit 1 safety injection system valves LNI-9A and LNI-10B from quarterly to cold shutdown. This change is due to the deletion of the boron injection tank on Unit 1. (Note that the testing of these Unit 1 valves is now identical to the corresponding Unit 2 valves which already reflect deletion of the Unit 2 boron injection tank). [Unit 1 only: pages II.35-2 and II.35-14a].
- Changes in certain safety injection system valves function as a result of deletion of Unit 1 boron injection tank. (Note: due to oversight the Unit 2 program as originally issued did not reflect the deletion of the Unit 2 boron injection tank for these corresponding functions). [Units 1 and 2: pages II.35-14 and II.35-15].
- Clarification that safety injection system valves NI-250, 251, 252, and 253 can be full stroked during refueling without disassembly. [Units 1 and 2: page II.35-31].

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- Deletion of steam generator blowdown recycle (BB) system valves BB-140, 141, 142, and 143 from the program since these valves have been removed from the Units 1 and 2 piping during the recently completed Unit 1/Cycle 3 and Unit 2/Cycle 2 refueling outages, respectively. Deletion of these valves is further discussed in a proposed license amendment request (ref. Mr. H. B. Tucker's letter to Mr. H. R. Denton dated September 28, 1984) and subsequent NRC approval (McGuire Nuclear Station Facility Operating Licenses NPF-9 (Unit 1) and NPF-17 (Unit 2) amendments 41 and 22, respectively). [Units 1 and 2: page II.37-3].

These revisions should be incorporated into your Unit 1 and 2 pump and valve inservice testing manual, removing any superseded pages of the program. Should there be any questions concerning the basis for any of the changes, please advise.

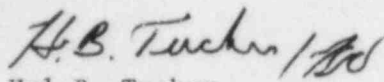
Duke Power Company intends to implement the Unit 1 and 2 program as revised on an interim basis pending program approval by the NRC.

Ms. R. M. Diggs' (NRC/OA) letter dated September 4, 1984 stated that as a result of the ONRR staff's preliminary review of Duke's April 20, 1984 application (Revisions 7 and 3 to the McGuire Nuclear Station Unit Nos. 1 and 2 pump and valve inservice testing program), it had been determined that a Class III fee (\$4,000) and a Class I fee (\$400) pursuant to 10 CFR 170.22 of the March 23, 1978 regulations were appropriate since the review would involve consideration of a single safety issue and a duplicate unit. Since these fees were not remitted with the April 20, 1984 submittal Duke was requested to remit the sum of \$4,400. With regard to this, the April 20, 1984 letter provided material to be incorporated into our previously transmitted IWP/IWV pump and valve inservice testing program (originally submitted for NRC review and approval on November 14, 1978 (Unit 1) and March 31, 1983 (Unit 2)) which is still currently under review and has not yet received formal NRC approval. The IWP/IWV program is part of the operating license application and fee for its review/approval should be covered by the fee for the operating license applications for McGuire Nuclear Station Units 1 and 2. Consequently, in view of the fact that the April 20, 1984 letter (as well as previous Duke letters submitting earlier revisions) submitted revisions to an open licensing issue which is currently under review, the \$4,400 fee is not appropriate and is not being remitted (nor is a \$150 application fee (under current 10 CFR 170 regulations) being remitted for the enclosed revisions 8/4). Once the IWP/IWV program has received final NRC approval any subsequent revisions would then be subject to the provisions of 10 CFR 170.

By copy of this letter, one copy of the above documents are also being provided to NRC-Region II.

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Very truly yours,


Hal B. Tucker

PBN:smh

Enclosures

cc: (w/enclosures)

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Mr. W. T. Orders
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McGuire Nuclear Station

Ms. Reba M. Diggs
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