



50-333

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 9, 1996

Mr. William Cahill, Jr.  
Chief Nuclear Officer  
Power Authority of the State  
of New York  
123 Main Street  
White Plains, NY 10601

SUBJECT: RELIEF REQUEST V61 FOR THE SECOND TEN YEAR INTERVAL (JULY 28, 1995 TO JUNE 28, 1997) OF THE INSERVICE TESTING PROGRAM

Dear Mr. Cahill:

By letter dated October 2, 1996, the Power Authority of the State of New York (PASNY) requested relief for the Second Ten Year Interval (July 28, 1995 to June 28, 1997) Inservice Testing Program to allow James A. FitzPatrick (JAF) to take full advantage of the provisions of 10 CFR Part 50, Appendix J, Option B during RFO-12. By letter dated March 27, 1996, as supplemented by April 24, 1996 and August 15, 1996, JAF submitted an amendment request to permit implementation of 10 CFR Part 50, Appendix J, Option B, with an exception to the guidelines of Regulatory Guide 1.163 for Type C testing of primary containment isolation valves in the reverse (non-accident) direction. Amendment No. 234 was issued on October 4, 1996.

PASNY requests relief from the testing requirements contained in ASME Section XI, 1980 Edition through Winter 1981 Addendum, Subsection IWV-3420. This specifies that Category A and AC leakage rate testing is performed every 2 years. As an alternative, PASNY requests that containment isolation valve testing shall be performed in accordance with ASME/ANSI OMA-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Water Power Plants," Paragraph 4.2.2.2, "Containment Isolation Valves." This paragraph states that Category A valves, which are containment isolation valves shall be tested in accordance with 10 CFR Part 50, Appendix J.

As a consequence of this change, Category A containment isolation valves that do not provide a reactor coolant system pressure isolation function will be analyzed in accordance with paragraph 4.2.2.3(e) of Part 10, and corrective actions will be made in accordance with paragraph 4.2.2.3(f) of Part 10. These additional actions are required in order to comply with 10 CFR 50.55a(b)(2)(vii). This request is consistent with the provisions of 10 CFR 50.55a(f)(4)(iv).

The alternative to the ASME Code is necessary to fully implement Appendix J, Option B, because the 1980 Edition of the Code does not differentiate between containment isolation valves and other valves that have a leak-tight safety function.

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The NRC staff has reviewed PASNY's October 2, 1996, proposal and has determined that it is acceptable to use a portion of the most recent edition of the ASME Code incorporated by reference in 10 CFR 50.55a (i.e., 1989 Edition) which references Part 10 of the ASME/ANSI 1987 *Operations and Maintenance Standards* (Part 10) for inservice testing of valves. The approval is pursuant to 10 CFR 50.55a(f)(4)(iv) subject to the requirements of 10 CFR 50.55a(b)(2)(vii).

In its application, PASNY stated that, in accordance with 10 CFR 50.55a(b)(2)(vii), it would analyze valves that do not provide a reactor coolant pressure boundary function in accordance with paragraph 4.2.2.3(e) and that it would make any corrective actions in accordance with paragraph 4.2.2.3(f) of Part 10.

Option B of 10 CFR Part 50, Appendix J, provides that a licensee may, if it so chooses, implement a performance-based containment isolation valve leak-rate testing program. The provisions of Option B allow that, for certain valves, the local leakage rate testing (referred to as Type C testing in Appendix J) need not be performed every refueling outage. Use of the later edition ASME Code (the 1989 Edition instead of the 1980 Edition) is necessary because containment isolation valves are specifically addressed in Part 10, referring the user to Appendix J for the leakage rate testing requirements for the containment isolation function. Part 10 does not specify a frequency of leakage testing the containment isolation valves. Valves that have a dual function (i.e., an additional leak-tight function other than containment isolation, such as pressure isolation valves) are to be tested in accordance with the requirements of the edition of the ASME Code to which JAF is licensed (currently the 1930 Edition through Winter 1981 Addendum). Therefore, this approval would not supersede any leak-tight safety function test requirements applicable to the subject valves.

If you have any questions on this matter, contact the JAF Project Manager, Karen Cotton at (301) 415-1438.

Sincerely,

*Darl A. Hood*

*for* S. Singh Bajwa, Acting Director  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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In its application, PASNY stated that, in accordance with 10 CFR 50.55a(b)(2)(vii), it would analyze valves that do not provide a reactor coolant pressure boundary function in accordance with paragraph 4.2.2.3(e) and that it would make any corrective actions in accordance with paragraph 4.2.2.3(f) of Part 10.

Option B of 10 CFR Part 50, Appendix J, provides that a licensee may, if it so chooses, implement a performance-based containment isolation valve leak-rate testing program. The provisions of Option B allow that, for certain valves, the local leakage rate testing (referred to as Type C testing in Appendix J) need not be performed every refueling outage. Use of the later edition ASME Code (the 1989 Edition instead of the 1980 Edition) is necessary because containment isolation valves are specifically addressed in Part 10, referring the user to Appendix J for the leakage rate testing requirements for the containment isolation function. Part 10 does not specify a frequency of leakage testing the containment isolation valves. Valves that have a dual function (i.e., an additional leak-tight function other than containment isolation, such as pressure isolation valves) are to be tested in accordance with the requirements of the edition of the ASME Code to which JAF is licensed (currently the 1980 Edition through Winter 1981 Addendum). Therefore, this approval would not supersede any leak-tight safety function test requirements applicable to the subject valves.

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Sincerely,  
original signed by D.Hood for  
S. Singh Bajwa, Acting Director  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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