



Nebraska Public Power District

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July 12, 1985

Office of Nuclear Reactor Regulation
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief

Dear Mr. Vassallo:

Subject: In-Service Testing (IST) Relief Requests

Reference: 1) Letter from J. D. Weaver to E. D. Sylvester
dated June 15, 1984, "Cooper Nuclear Station
Second 10-Year In-Service Testing (IST)
Program"

In Reference 1 the District submitted for review the entire second 10-year IST Program including relief requests. Because the Reactor Recirculation Loops A and B discharge bypass valves (RR-MO-54A, B) were removed as part of the District's recirculation pipe replacement project, a revised Relief Request RV-03 is enclosed to reflect current pipe configuration.

A new relief request, RP-05, "High Pressure Coolant Injection (HPCI) Test Method" is also enclosed along with an updated index of relief requests.

If there are any questions related to the enclosed, please call.

Sincerely,

Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP/grs:emz12/10
Enclosures

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RELIEF REQUESTS

<u>Tab</u>	<u>R.R. No.</u>	<u>Description</u>
1	RP-01	Bearing Temperature
2	RP-02	SLC Pump Inlet Pressure
3	RP-03	SW Pump Vibration
4	RP-04	Pump Vibration Measurement Method
5	RP-05	HPCI Test Method
6	RV-01	Valve LLRT Method and Leakage Criteria
7	RV-02	RHR-MO-920, RHR-MO-921, Test Frequency
8	RV-03	RR-MO-53A, B Test Frequency

Relief Request RP-05

PUMP: High Pressure Coolant Injection (HPCI)

CLASS: IIN

FUNCTION: Emergency Core Cooling System

TEST REQUIREMENT: An in-service test shall be conducted with the pump speed adjusted to the reference speed for variable speed drives. The resistance of the system shall be varied until either the measured differential pressure or the measured flow rate equals the corresponding reference value.

BASIS FOR RELIEF: Currently, the HPCI pump is tested by duplicating a specified flow and pump discharge pressure, and comparing the resultant pump speed to a reference pump speed. This test method is preferred because it requires operator regulation of only one parameter, pump discharge pressure (flow automatically controlled). This minimizes the duration of the test surveillance, and therefore minimizes suppression pool heat-up.

Conversely, testing in accordance with code requirements requires operator regulation of two test parameters simultaneously (pump speed and discharge pressure), with resultant flow being compared to a reference flow. Operator manipulation of two test parameters to duplicate a third parameter for the duration of the test is not considered feasible by the District.

ALTERNATIVE TEST: Duplicate specified flow and pump discharge pressure, and compare resultant pump speed to a reference speed. The District will determine the limits for acceptable operation.

Relief Request RV-03, Revision 1

VALVE: RR-MO-53A, B

CLASS: IN

FUNCTION: RR-MO-53A, B - Reactor Recirculation Loops A and B Pump Discharge Isolation Valves

BASIS FOR RELIEF: RR-MO-53A, B cannot be stroked during normal power operation without dead-heading their respective reactor coolant pumps (bypass valves removed during Refueling Outage No. 9).

ALTERNATIVE TEST: Stroke above valves once per year during refueling outage or quarterly when the reactor is in cold shutdown >48 hours.