

50-454/455



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 18, 1996

Ms. Irene M. Johnson, Acting Manager  
Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: INSERVICE TESTING PROGRAM RELIEF REQUESTS FOR PUMPS AND VALVES,  
BYRON STATION, UNITS 1 AND 2 (TAC NOS. M94432 AND M94433)

Dear Ms. Johnson:

In a letter dated December 22, 1995, Commonwealth Edison Company (ComEd, the licensee), submitted the second ten-year interval inservice testing program for pumps and valves for the Byron Station, Units 1 and 2. The submittal included Pump Relief Request PR-1 and Valve Relief Requests VR-1, VR-2, VR-3, VR-4, VR-5, VR-6, VR-7, and VR-8.

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice testing (IST) of certain American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Code and applicable addenda, except where relief has been requested and granted or proposed alternatives have been authorized by the Commission pursuant to 10 CFR 50.55a(f)(6)(i), (a)(3)(i), or (a)(3)(ii). In order to obtain authorization for relief, the licensee must demonstrate that: (1) conformance is impractical for its facility; (2) the proposed alternative provides an acceptable level of quality and safety; or (3) compliance would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety.

We have completed our review of the ComEd requests for relief from the ASME Code. The request for an allowed variance of  $\pm 1$  psig for the diesel oil transfer pumps (Pump Relief Request PR-1) is granted pursuant to 10 CFR 50.55a(f)(6)(i).

With regard to Relief Request VR-2, relief is granted pursuant to 10 CFR 50.55a(f)(6)(i) to verify the capability of the valves to stroke by disassembly and inspection. Additionally, for four of the valves included in the relief request (valves 1/2CS011A/B and 1/2CS020A/B), considering that it would be a hardship without a compensating increase in the level of quality and safety to require disassembly and inspection at the same time as the full flow testing, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii). For performing disassembly and inspection during any plant mode, the alternative schedule is authorized pursuant to 10 CFR 50.55a(a)(3)(i) based on the activity ensuring an adequate level of quality and safety, provided that ComEd considers all of the appropriate guidance referenced in our evaluation - including a determination that the activity can be performed in a manner that does not increase the risk to the plant.

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Relief Request VR-3 is granted pursuant to 10 CFR 50.55a(f)(6)(i) based on the impracticalities in the design of the valves that limit inservice testing in the traditional manner using position indicating lights. In implementing this relief request, ComEd must include acceptance criteria in the test procedure which is related to the method of verifying that the valves stroke during the quarterly pump test.

Relief Requests VR-4 and VR-5 are granted pursuant to 10 CFR 50.55a(a)(3)(i) based on the acceptable level of quality and safety that the alternatives provide. Relief Request VR-6 is granted pursuant to 10 CFR 50.55a(f)(6)(i) based on the impracticalities of the design for verifying closure of the valves.

The alternative means of measuring flow through the check valve of train B of the deep well pumps (Relief Request VR-7) is authorized pursuant to 10 CFR 50.55a(a)(3)(i). The proposal to test with measured flow once per 18 months is granted pursuant to the provisions of 10 CFR 50.55a(f)(6)(i) based on the impracticalities of the design not including permanently installed flow instrumentation and the burden of using strap-on instrumentation quarterly.

Relief Request VR-8 relates to components outside of the scope of 10 CFR 50.55a; therefore, ComEd may implement the alternative without specific NRC approval.

Relief Request VR-1 is denied because there is insufficient justification provided for the establishment of a performance-based testing program for certain check valves in lieu of quarterly exercising. Consequently, ComEd must continue to perform leakage testing during each refueling outage.

The results of our review are included in the enclosed Safety Evaluation.

Sincerely,

/s/

Robert A. Capra, Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455

Enclosure: Safety Evaluation

cc w/encl: see next page

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