March 5, 1986

Docket No.: 50-213

Mr. John F. Opeka, Senior Vice President
Nuclear Engineering and Operations
Connecticut Yankee Atomic Power Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON INSERVICE TE TING PROGRAM

Re: Haddam Neck Plant

By letter dated April 9, 1984, Connecticut Yankee Atomic Power Company requested revisions to its inservice testing program to incorporate the requirements of the 1980 edition of Section XI of the ASME code. We have reviewed the information provided and concluded that there is insufficient information for us to complete our evaluation. Enclosure 1 to this letter contains a list of questions which have arisen during our review.

Given that many of the requests for information are clarifications involving proper component designation or position, we believe that a meeting between our technical staffs would be the best approach to the resolution of these concerns.

Therefore, we request that, within two weeks of receipt of this letter, your staff contact Mr. P. Bissett (215-337-5266) of NRC Region I, to establish a meeting date and place for the resolution of our concerns regarding the inservice testing program.

Sincerely,

Original signed by: F. Akstulewicz

Frank Akstulewicz, Project Manager
Integrated Safety Assessment
Project Directorate
Division of PWR Licensing - B

Enclosure:
As stated

cc w/enclosure:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Francis M. Akstulewicz

Frank Akstulewicz, Project Manager
Integrated Safety Assessment
Project Directorate
Division of PWR Licensing - B

Enclosure:
As stated

cc w/enclosure:
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Enclosure 1

Request for Additional Information Concerning the
Haddam Neck Inservice Testing Program Update

The following questions have arisen from an initial review of the Haddam Neck IST Program.

Pumps

1. What is the status of Engineering Evaluations agreed upon to be performed for Charging Pumps, P-18-1A, P-18-1B, inlet pressures (re: 1981 SER)?

2. Same as above for Residual Heat Removal Pumps, P-14-1A and P-14-1B (re: 1981 SER).

3. What testing program actions are provided for EDG auxiliary systems pumps that fall under the testing requirements of ASME Section XI, Subsection IWP?

Valves

Pressurizer Relief/Reactor Coolant

1. As listed on page 1 of IST submittal, should PRSOV0522A be PR-SOV-522A?

2. Why can't the below listed valves be exercised during cold shutdowns vice reactor refuelings?:

PR-SOV-522A	PR-SOV-596A
PR-SOV-522B	PR-SOV-596B
PR-SOV-522C	PR-SOV-596C
PR-SOV-522D	PR-SOV-596D

Safety Injection

1. Valves CD-CV-872A&B, as listed in various sections of the IST submittal, are shown as SI-CV-872A&B on P&ID 26010. What system designation is correct?

2. Same as above except for valves CD-MOV-871A&B?

3. Provide a more technical justification for not full stroke exercising valves SI-CV-103, 107A&B, and CD(SI)-CV-872A&B in accordance with the code specified frequency (with the maximum time interval being two years).

4. Provide a more technical justification for not full stroke exercising valves SI-CV-856A&B and SI-CV-862A,B,C&D in accordance with the code specified frequency (with the maximum time interval being two years).

5. For items 3&4 above, why is there no mention of part-stroking as previously addressed in the 1981 SER?

6. Why are valves CD (SI)-MOV-871A&B listed as category B and not category A valves, since they serve also as a pressure isolation function?

7. Why is a leak test relief request not needed to be submitted for CD (SI)-MOV-871A&B?

8. Is SI-V-102 a locked open (L.O.) valve? If so, it's not indicated as such on P&ID 26010.

9. Is SI-V-873 a L.O. valve? If so, it's not indicated as such on P&ID 26010.

Residual Heat Removal

1. RH-MOV-33B, as listed on the IST submittal, is shown as RA-MOV-33B on P&ID 26018-3. Which is correct?

2. RH-MOV-780, as listed on the IST submittal, is shown as RC-MOV-780 on P&ID 26007-1. Which is correct?

3. Why is RH-MOV-784 not part of the IST program submittal?

4. Why should valve RH-MOV-874 not be categorized category B?

5. Why cannot valve RH-MOV-29 be exercised in accordance with the Code specified frequency?

6. RH-MOV-29 is shown on P&ID 26028 as a normally open valve, however it is shown on IST submittal as a normally closed valve. Which is correct?

7. Is RA-MOV-21 a locked closed valve? Its designation on IST/ISI boundary diagrams is unclear.

8. Provide a more technical justification for not full stroke exercising valves RH-CV-783 and RH-CV-808 in accordance with the specified Code frequency (with the maximum testing interval being two years). Also, when was RH-CV-808 disassembled?

9. RH-MOV-23, is listed on the IST submittal as a normally closed valve, but is shown on P&ID 26028 as normally open. Which is correct?

Chemical & Volume Control

1. RWST to charging pump suction check valve is shown as BA-CV-372 on IST submittal valve list and P&ID 26018-3 but is shown as BA-CV-372A on IST relief request narrative section and ISI boundary diagram. Which is correct?

2. CH-MOV-331 on IST submittal lists relief request for exercising, however, no justification is given for this relief.

3. CH-MOV-331 lists no limiting stroke time? Why not?

4. Is DH-MOV-311 motor-operated or hand-operated? It is shown as a manual valve on P&ID 26018-1. Which is correct?

5. If DH-MOV-311 is motor operated, should it have a limiting stroke time?

6. DH-MOV-311 is shown as normally closed on P&ID 26019-1, but as normally open on IST submittal and ISI boundary diagram. Which is the correct position?

7. What is the normal position of DH-MOV-310? Where (what drawing) is the designation?

8. If DH-MOV-311 is a passive valve, then why is a relief being requested (IWP Table 3700-1)?

9. Valve CH-MOV-331 is listed as a containment isolation valve per Technical Specification Table 3.11-1, page 3-20C. However, this valve is listed as a Category B valve in the IST submittal. This is in conflict with the T.S. Please explain.

Main Steam

1. What is the limiting stroke time for valve MS-HICV-1201, MS-TV-1212 and MS-TV-1213?

2. Provide justification for not exercising valves MS-TV-1212 and MS-TV-1213 in accordance with the Code specified frequency.

3. MS-HICV-1201 is listed as a normally closed valve on the IST submittal, however it is shown as a normally open valve on P&ID 26012-1. Which is correct?

4. MS-PICV-1206A&B are listed as normally closed on the IST submittal, however, they are shown as normally open on P&ID 26012-1. Which is correct?

5. Valves MS-TV-1212 and 1213 are listed as containment isolation valves per Technical Specification Table 3.11-1, page 3-20C. Yet they are listed as Category B valves in the IST submittal. This is in conflict with the T.S. Explain.

Feedwater

1. Why are valves FW-CV-143-1,2,3,&4 verified in the open direction only?

2. Provide justification for not exercising FW-CV-143-1,2,3,4 in accordance with the Code specified frequency.

3. AFW pump, P-32-1A, discharge check valve is shown on FW-CV-184 on P&ID 26013-1 but listed as FW-CV-153B on the IST submittal. Which is correct?

4. AFW Pump P-32-1B, discharge check valve is shown as FW-CV-153 on P&ID 26013-1, but listed as FW-CV-184 on the IST submittal. Which is correct?

5. FW-HICV-1301-1,2,3 & 4, are listed as normally closed valves on the IST submittal, but are shown as normally open on P&ID 26013-1. Which is correct?

6. FW-CV-156-1,2,3,4 listed as normally closed valves on the IST submittal, but are shown as normally open on P&IO 26013-1.

7. What is the limiting stroke time requirement for FM-MOV-160?

8. Why aren't valves FW-CV-182, FW-CV-192, 194, 196, and 198 exercised according to the Code Frequency Requirements?

9. FW-MOV-160 is shown as open on P&ID 26013-1, closed on ISI boundary diagram, and open/closed on IST submittal. Which is correct?

Containment Isolation Valves

1. The following valves, previously included in the 1977 IST program submittal, are not listed in the most recent submittal. Why? Please address each group of valves individually.

BD-V-506
BD-V-515
BD-V-522
BD-V-529
BD-TV-1312-1
BD-TV-1312-2
BD-TV-1312-3
BD-TV-1312-4
VH-V-507
VH-V-507B
CH-CV-305A
CH-CV-305B
CH-CV-305C
CH-CV-305D
FW-CV-192
FW-CV-194
FW-CV-196
FW-CV-198

2. What is the normal position of the following valves? The positions are not shown on the IST list.

VS-CV-1103
CC-CV-721
CC-CV-731
VS-CV-1104

3. What is the limiting stroke time for FM-MOV-31?

4. Valves SF-CV-866A and SF-CV-866B, as listed on the IST submittal are shown as SF-CV-812 abd SF-CV-866 respectively on P&ID 26049. Which is correct?

5. WG-AOV-558, as listed on IST submittal, is shown as WG-FCV-558 on P&ID26007-2. Which is correct?

6. SS-V-984A as listed on IST submittal, appears to be shown as WG-V-984A on P&ID 26007-2. Which is correct?

7. BV-1-1B is listed as a locked-closed butterfly valve on the IST submittal but is shown as a normally open gate valve on P&ID 26024. Which is correct?

8. BV-1-1A is listed as a locked-closed valve on the IST submittal, but is shown as a normally open valve on P&ID 26024. Which is correct?

9. LD-AOV-202, as listed on IST submittal, is shown as LD-FCV-202 on P&ID 26018-1. Which is correct?

10. What are the P&ID locations of WD-HICV-1840 and WD-TV-1846?

11. Is valve designator SDV-12-1 correct? Or is it VS-SOV-12-1? What is its P&ID location?

12. Should valves CH-MOV-314, 313, 312, and 311 be included in the IST program? If not, why not?

13. Should FM-CV-35 (shown as RH-CV-35 on P&ID 26056-1) be included in the IST program? If not, why not? Also it is shown as ?-CV-24 on ISI boundary diagram. Which one is correct?

14. FM-MOV-31, as listed on the IST submittal, is shown as RH-MOV-31 on P&ID 26056-1. Which is correct?

15. Provide an explanation as to why the following valves are considered "passive"?

    CC-TV-1411
    CC-FCV-608
    CH-TV-334
    FM(RH)MOV-31

16. What are the P&ID locations for the following valves?

    SS-SOV-150A,B,C,D
    SS-SOV-151A,B,C,D

Service Water

1. SW-AOV-129 & 130, as listed on the IST submittal, are shown as SW-FCV-129 & 130 on P&ID 26014-1. Which is correct?

2. Should SW-MOV-30 (emergency fire water supply to service water) be included in the IST program? If not, why not?

Relief Valves

1. Is DH-RV-1847 included in the IST program? It is listed under Table IWV-3, but is not under any of the valve system listings.

2. Should CH-RV-332 be included in the IST program? If not, why not?

D/G Auxiliary Systems

1. No components are listed. Explain why the IST program does not include pumps and valves of the following systems:

   - Fuel Oil Storage and Transfer System
   - Cooling Water System
   - Starting System
   - Lubrication System
   - Combustion Air Intake & Exhaust System