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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: Beaver Valley Power Station, Unit No. 1
Doyle No. 50-334, License No. DPR-66
Inservice Testing Program Ten-Year Update

The purpose of this submittal is to forward to the Nuclear Regulatory Commission the Beaver Valley Power Station Unit No. 1 updated Inservice Testing (IST) Program. This program is applicable for the third Ten-Year Interval update of the IST Program as required by 10 CFR 50.55a.

Enclosure 1 provides a summary of changes highlighting the revisions made to the third Ten-Year interval Unit No. 1 IST Program. Enclosure 2 is Issue 3, Revision 0 of the Unit No. 1 IST Program for pumps and valves. Also, included as Enclosure 3 is a set of drawings referred to as valve operating number diagrams for Unit No. 1 which has the IST components identified by their equipment identification numbers.

Development of this program is based on the American Society of Mechanical Engineers (ASME) / American National Standard Institute (ANSI) Operational and Maintenance (OM) Standard, Part 6, "Inservice Testing of Pumps in Light Water Reactor Power Plants" (OM-6), and Part 10, "Inservice Testing of Valves in Light Water Reactor Power Plants" (OM-10), OMA-1988 Addenda to the OM-1987 Edition, in accordance with the ASME Boiler and Pressure Vessel Code (B&PV), Section XI, 1989 Edition. Additionally, the guidance of Attachment 1 and Supplement 1 of Generic Letter No. 89-04, "Guidance on Developing Acceptable Inservice Testing Programs" has been followed in program development.

This submittal contains eight relief requests for components which cannot be tested in accordance with the above references and, therefore, are submitted as proposed

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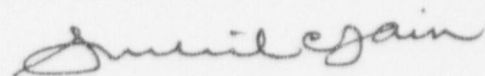


relief requests under the provisions of 10 CFR 50.55a(a)(3)(i) for which Nuclear Regulatory Commission approval is required. Several of these relief requests are supported with information describing the determination that conformance with certain code requirements is impractical per 10 CFR 50.55a(f)(5)(iii). In each case, the proposed alternatives to the Code required testing will provide an acceptable level of quality and safety as described in the specific relief requests.

The current Ten-Year IST interval ends September 20, 1997. This date follows the start of the Unit No. 1 twelfth refueling outage which has a start date of September 5, 1997. 10 CFR 50.55a(f)(4)(iv) states that inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to Commission approval. It is undesirable to change implementing procedures during a refueling outage; therefore, it is requested that the NRC approve implementation of this third interval program earlier than the current interval expiration date. Implementation is requested for September 5, 1997. This third interval program has been prepared following the requirements of the 1989 Edition of the ASME B&PV Code as stated above which is consistent with 10 CFR 50.55a paragraph (b). The expiration date would remain on the current schedule of September 20, 2007.

If you have any questions regarding this request, please contact Mr. J. Arias at (412) 393-5203.

Sincerely,



Sushil C. Jain

Enclosures

- c: Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. S. Brinkman, Sr. Project Manager

ENCLOSURE 1

SUMMARY OF CHANGES
THIRD 10 YEAR INTERVAL UNIT 1 IST PROGRAM

ENCLOSURE 1

SUMMARY OF CHANGES THIRD 10 YEAR INTERVAL UNIT 1 IST PROGRAM

The third 10-year interval for the BVPS Unit 1 IST Program will begin on September 20, 1997. The new program is based on the following:

- American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI) Operational and Maintenance (OM) Standard, Part 6, "Inservice Testing of Pumps in Light Water Reactor Power Plants" (OM-6), and Part 10, "Inservice Testing of Valves in Light Water Reactor Power Plants" (OM-10), OMA-1988 addenda, in accordance with the ASME Boiler and Pressure Vessel Code Section XI, 1989 edition.
- Generic Letter No. 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," April 3, 1989.
- NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," April 1995.

There were significant changes in the regulations between the 1983 edition of the ASME Code, (the present Code in effect) and the 1989 edition (the Code for the new program). These changes necessitated several changes to the IST Program. In addition, to support this 10-year interval update, an IST Program Basis Document was developed. The Basis Document examined every Category 1 pump and valve to determine whether it should be included in, or excluded from the IST Program and if the testing performed is adequate. As a result of the review several other changes were also made to IST Program. The following is a summary of all of the changes made to the Program.

- I) The following are changes to Section I of the BVPS-1 IST Program "Pump Testing Requirements."
 - a) The new edition and addenda of the Code were referenced. In addition, where IWP or ASME had been referenced, OM-6 is now referenced and the correct tables from OM-6 have been incorporated.
 - b) Specific mention is made that BVPS-1 is licensed Hot Shutdown as its safe shutdown condition. NUREG-1482, Section 2.2 states that this must be documented in the IST Program, because the current scope defined by the Code includes pumps and valves required to achieve and maintain cold shutdown rather than safe shutdown.
 - c) A "Cold Shutdown Justification" Section and a "Refueling Outage Justification" Section were added to the IST Program for those pumps tested only during cold shutdowns or refueling outages as permitted by paragraphs 5.3, 5.4 or 5.5 of OM-6.

ENCLOSURE 1

SUMMARY OF CHANGES

- II) The following are changes to Section II of the BVPS-1 IST Program "Pump Outlines."
- a) All of the pump outline sheets were revised to delete the testing requirements for suction pressure (Pi), bearing temperature (Tb) and lubricant level observation (L). OM-6 does not require these parameters to be measured.
 - b) The Remarks column for all of the pumps was expanded to state how the pump was tested. (i.e., Pump is tested on recirc flow quarterly and with full flow during refueling outages.) Any pump relief requests (PRRs), cold shutdown justifications (PCSJs) and refueling outage justifications (PROJs) that apply are also listed.
 - c) The Comments Column was expanded to include details on how the parameters are being measured and to specifically mention the sections of the Code, GL 89-04 and NUREG-1482 that apply.
- III) The following are changes to Section III of the BVPS-1 IST Program "Pump Cold Shutdown Justifications."
- a) Pump Cold Shutdown Justification No. 1 (PCSJ1) was written for the Residual Heat Removal pumps, [1RH-P-1A, 1B], to document that the pumps will be tested quarterly during cold shutdowns. This is permitted by OM-6, paragraph 5.4, "Pumps in Systems Out of Service." This PCSJ is RR4 in the current revision (Issue 2, Rev 14) of the IST Program.
 - b) Pump Cold Shutdown Justification No. 2 (PCSJ2) was written for the Auxiliary Feedwater pumps, [1FW-P-2, 3A, 3B], to document that the pumps will be tested quarterly on recirculation flow and at full flow during cold shutdowns or on startup from cold shutdowns ([1FW-P-2] will be tested on start-up from cold shutdown), because there is no installed flow instrumentation on the recirc line. This is in accordance with GL 89-04, Position 9. This PCSJ is RR8 in the current revision (Issue 2, Rev 14) of the IST Program.
- IV) The following are changes to Section IV of the BVPS-1 IST Program "Pump Refueling Outage Justifications."
- a) Pump Refueling Outage Justification No. 1 (PROJ1) was written for the Boric Acid Transfer pumps, [1CH-P-2A, 2B] to document that the pumps will be tested quarterly on recirculation flow and at full flow during refueling outages, because there is no installed flow instrumentation on the test line. This is in accordance with GL 89-04, Position 9. This PROJ is RR3 in the current revision (Issue 2, Rev 14) of the IST Program.

ENCLOSURE 1

SUMMARY OF CHANGES

- b) Pump Refueling Outage Justification No. 2 (PROJ2) was written for the Inside Recirculation Spray pumps, [1RS-P-1A, 1B] to document that the pumps will be tested on recirculation flow during refueling outages, because a temporary dike must be installed in containment around the sump. This is in accordance with OM-6, paragraph 5.5, "Pumps Lacking Required Fluid Inventory." This PROJ is RR6 in the current revision (Issue 2, Rev 14) of the IST Program.
 - c) Pump Refueling Outage Justification No. 3 (PROJ3) was written for the Outside Recirculation Spray pumps, [1RS-P-2A, 2B] to document that the pumps will be tested on recirculation flow during refueling outages, because in order to test this pump the pump casing must be filled and then drained out after the test, requiring a containment entry. This is in accordance with OM-6, paragraph 5.5, "Pumps Lacking Required Fluid Inventory." This PROJ is RR7 in the current revision (Issue 2, Rev 14) of the IST Program.
- V) The following are changes to Section V of the BVPS-1 IST Program "Pump Relief Requests."
- a) Pump Relief Request No. 1 (PRR1) is a new relief request written to allow the use of spectral analysis in lieu of placing a pump on double frequency testing when the vibration levels are outside the acceptable range. This request is based on a later edition of the ASME Code; ASME OMc Code-1994, Subsection ISTB, Paragraph 4.6, "New Reference Values," which would allow analysis.
 - b) Pump Relief Request No. 2 (PRR2) was written for various instruments which do not meet the requirements of OM-6, paragraph 4.6.1.2(a), "Range," however the accuracy of the instruments is more conservative than the requirements of OM-6, paragraph 4.6.1.1, "Quality." The combination of higher range and better accuracy for each instrument yields a reading at least equivalent to the reading achieved from instruments that meet OM-6. This is in accordance with NUREG-1482, Section 5.5.1, "Range and Accuracy of Analog Instruments." This PRR is RR12 in the current revision (Issue 2, Rev 14) of the IST Program. ([FI-1CH-122A] was deleted from the relief request because it is no longer used in pump testing and [FI-1CH-943] was deleted because the test is now performed with the reference flow greater than one third of the range.)
 - c) Pump Relief Request No. 3 (PRR3) was written for the Component Cooling Water pumps, [1CC-P-1A, 1B & 1C] to allow the use of a pump curve. The basis for this request is NUREG-1482, Section 5.2, "Use of Variable Reference Values for Flow Rate and Differential Pressure During Pump Testing." This PRR is RR11 in the current revision (Issue 2, Rev 14) of the IST Program.

ENCLOSURE 1

SUMMARY OF CHANGES

- d) Pump Relief Request No. 4 (PRR4) was written for the Diesel Generator Fuel Oil pumps, [1EE-P-1A, 1B, 1C & 1D] to allow the flow rate to be calculated based on the level change over time in the day tank. The basis for this request is NUREG-1482, Section 5.5.1, "Range and Accuracy of Analog Instruments." This PRR is RR10 in the current revision (Issue 2, Rev 14) of the IST Program.
- e) The following Relief Requests in the current revision (Issue 2, Rev 14) were deleted:
 - RR1 - OM-6 allows vibration measurements to be taken in velocity units and does not require bearing temperatures to be taken.
 - RR2 - NUREG-1482, Section 5.5.3 states that the use of tank level or river elevation to obtain the suction pressure for pump testing is permissible per OM-6.
 - RR5 & RR9 - OM-6 does not require ΔP to be measured for positive displacement pumps.
- VI) The following are changes to Section VI of the BVPS-1 IST Program "Pump Minimum Operating Point (MOP) Curves."
 - a) The MOP Curves for the HHSI pumps, [1CH-P-1A, 1B & 1C], were revised to incorporate the most current calculation for the pumps (8700-DMC-3072, Rev 1, 3/29/96).
 - b) The MOP Curves for the River Water, [1WR-P-1A, 1B & 1C], pumps were revised to incorporate the most current calculation for the pumps (8700-DMC-3136, Rev 0, 11/29/96).
 - c) MOP Curves were added for the Reactor Plant Component Cooling pumps, [1CC-P-1A, 1B & 1C], based on calculation 8700-DMC-3052, Rev 0, 5/14/96.
- VII) The following are changes to Section VII of the BVPS-1 IST Program "Valve Testing Requirements."
 - a) The new edition and addenda of the Code were referenced. In addition, where IWV or ASME had been referenced, OM-10 is now referenced and the correct tables from OM-10 have been incorporated.
 - b) Specific mention is made that BVPS-1 is licensed Hot Shutdown as its safe shutdown condition. NUREG-1482, Section 2.2 states that this must be documented in the IST Program, because the current scope defined by the Code includes pumps and valves required to achieve and maintain cold shutdown rather than safe shutdown.

ENCLOSURE 1

SUMMARY OF CHANGES

- c) The paragraphs describing the requirements of the Code for valves were revised to reflect OM-10. For example, the limits for stroke time testing have been changed and are now based on a reference or baseline time instead of the previous stroke time. In addition, double frequency testing has been eliminated and more stringent rules for declaring a valve inoperable are included.
 - d) Relief valve testing is required to be conducted in accordance with the requirements of OM-1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices."
 - e) A "Refueling Outage Justification" Section was added to the IST Program for those valves tested only during refueling outages as permitted by paragraphs 4.2.1.2 and 4.3.2.2 of OM-10.
- VIII) The following are changes to Section VIII of the BVPS-1 IST Program "Valve Outlines."
- a) The Valve Cold Shutdown Justification, Valve Refueling Outage Justification and Relief Request Nos. listed were revised to reflect the changes made.
 - b) The valve type column for the Pressurizer Code Safety Valves and the Main Steam Safety Valves was revised to say "Safety" instead of "Relief." In addition, the test frequency for the safety valves was revised to 5 years and for relief valves to 10 years, per OM-1.
 - c) As a result of the Basis Document Review, manual valves, [1CH-25, 26, 27, 158, 159 & 161], were changed to active valves and a quarterly stroke test was added.
 - d) As a result of the Basis Document Review, a full-stroke test in the reverse direction was added for the following check valves: [1CH-75, 76], [1SI-83, 84, 94 & 95] [1QS-3, 4], [1RS-100, 101] and [1AS-278]. A forward direction test for [1CH-369] was also added. The valves have always been tested, but the test was not listed in the IST Program.
 - e) As a result of the Basis Document Review, [FCV-1CH-114A] was added to the IST Program to be stroked and timed quarterly.
 - f) The remote position verification (RPV) was deleted from manual valve [1CH-135] because the reach rod for this valve was disconnected.
 - g) The testing frequency listed for valves that are leak tested, not in accordance with the Appendix J Program, was revised to 2 years. For PIVs the frequency listed is 2 year/ CSD or R per Tech Specs. Containment Isolation Valves tested per the Appendix J Program are tested at the frequency required by Option B of Appendix J. They are listed as a "Special Frequency (SP)" in the IST Program.

ENCLOSURE 1

SUMMARY OF CHANGES

In addition, the test requirement for valves tested per the Appendix J Program was revised to "LTJ" to differentiate between the various leakage tests performed.

- h) As a result of the Basis Document Review, deleted the following valves from the IST Program: [MOV-1CH-275A, B, C], [1SI-447, 448, 451, 452], [MOV-1SI-864A, B], [RV-1CC-112A, A1, A2, B, B1, B2, C, C1, C2] and [1VS-176, 177, 178, 179]. They do not perform a function in shutting down a reactor, in maintaining the shutdown or in mitigating the consequences of an accident.
 - i) As a result of the Basis Document Review, the following valves will be stroked and timed in both the open and closed directions: [MOV-1RH-700, 701, 720A & 720B], [MOV-1RW-103A, B, C & D], [MOV-1RW-106A, B] and [MOV-1RW-114A, B]. They have always been stroked in both directions, but only timed in one direction.
 - j) The relief valves added in DCPs 2204 and 2205 were added to the IST Program to be setpoint tested: [RV-1SI-894], [RV-1SS-605, 606, 607 & 608] and [RV-1CC-261, 262, 263 & 264]. All of these relief valves except [RV-1SI-894] will also be leakage tested per the Appendix J Program.
 - k) As a result of the Basis Document Review, the following valves have been designated as "Passive" in the IST Program: [MOV-1QS-100A, B] and [TV-1CC-128, 130, 132]. These valves are not required to change position in an accident.
 - l) As a result of the Basis Document Review, the relief valves for the intake structure door seals have been added to the IST Program to comply with the "maintain the plant in shutdown condition" portion of the scoping requirements of OM-10. This is a change from the previous Code requirements. The following valves were added and will be setpoint tested: [RV-11A-107A, B, C, D, E & F].
 - m) As a result of the Basis Document Review, several editorial changes were made such as correcting the OM drawing referenced and the drawing coordinates for various valves. Also, several valves were moved from System 44C to System 44A, from System 32 to System 30 and from System 27 to System 26. The testing performed is still the same.
- IX) The following are changes to Section IX of the BVPS-1 IST Program "Valve Cold Shutdown Justifications."
- a) All of the Valve Cold Shutdown Justifications were converted from the existing Cold Shutdown Justifications. Specific references to the Code, GL89-04 and NUREG-1482 were added to all of the justifications and additional justification was added to a few of them.

ENCLOSURE 1

SUMMARY OF CHANGES

- b) Cold Shutdown Justifications CSJ6 & 7 were converted to Valve Refueling Outage Justification No. 7. The valves are the normal charging and letdown containment isolation valves. They are not able to be stroked at every cold shutdown. Therefore, justification for testing only during the cold shutdowns where the conditions permit stroking the valves was added to VROJ7.
- c) The following existing Cold Shutdown Justifications were deleted:
CSJ8 - This was deleted in a previous revision.
CSJ23 - The valves in this CSJ were made passive and stroke testing is no longer required. Therefore, the CSJ is no longer required.
The Valve Cold Shutdown Justifications were renumbered to put them in the order they appear in the Valve Outline Sheets and to delete the unnecessary CSJs.
- X) The following are changes to Section X of the BVPS-1 IST Program "Valve Refueling Outage Justifications."
- a) The following Valve Refueling Outage Justifications were written, converting existing relief requests. Specific references to the Code, GL 89-04 and NUREG-1482 were added to all of the justifications and additional justification was added to them:

New Valve Refueling Outage Justification	Existing Relief Request No.	Valve Number	Basis for Justification
VROJ1	RR2	1RC-68	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.
VROJ2	RR3	1RC-72	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.
VROJ3	RR46	SOV-1RC-455C1, C2, D1, D2, SOV-1RC-456-1, 2	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10.
VROJ4	RR4	1CH-22, 23, 24	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and GL 89-04, Position 1.
VROJ5	RR5	1CH-31	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.

ENCLOSURE 1

SUMMARY OF CHANGES

New Valve Refueling Outage Justification	Existing Relief Request No.	Valve Number	Basis for Justification
VROJ6	RR6	1CH-181, 182, 183	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.
VROJ7	CSJ6 & 7	TV-1CH-204 MOV-1CH-289, 310 LCV-1CH-460A, B	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and NUREG-1482, Section 3.1.1.4.
VROJ8	RR10	MOV-1CH-308A, B, C	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and NUREG-1482, Section 3.1.1.4.
VROJ9	RR8	1CH-369	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.
VROJ10	RR12	MOV-1CH-378, 381	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and NUREG-1482, Section 3.1.1.4.
VROJ11	RR14	1SI-5	If exercising is not practicable during plant operation or cold shutdowns it may be limited to part stroke at cold shutdowns and full-stroke at refueling outages, per OM-10 and GL 89-04, Position 1.
VROJ12	RR15	1SI-6, 7	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and GL 89-04, Position 1.
VROJ13	RR16, 18	1SI-10, 11, 12 1SI-23, 24, 25	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10, GL 89-04 Position 1 and NUREG-1482, Section 4.1.4.
VROJ14	RR17	1SI-20, 21, 22 1SI-100, 101, 102	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and GL 89-04, Position 1.

ENCLOSURE 1

SUMMARY OF CHANGES

New Valve Refueling Outage Justification	Existing Relief Request No.	Valve Number	Basis for Justification
VROJ15	RR19	1SI-27	If exercising is not practicable during plant operation or cold shutdowns it may be limited to part stroke at cold shutdowns and full-stroke at refueling outages, per OM-10, GL 89-04, Position 1 and NUREG-1482, Section 4.1.4.
VROJ16	RR21	1SI-83, 84, 95	If exercising is not practicable during plant operation or cold shutdowns it may be limited to part stroke at cold shutdowns and full-stroke at refueling outages, per OM-10, GL 89-04, Position 1 and NUREG-1482, Section 4.1.4.
VROJ17	RR22	1SI-94	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10, GL 89-04, Position 1 and NUREG-1482, Section 4.1.4.
VROJ18	RR50	1SI-115, 116	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10.
VROJ19	RR24	MOV-1SI-867C, D	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10.
VROJ20	RR26	TV-CC-103A, A1, B, B1, C, C1, TV-1CC-105D1, D2, E1, E2, TV-1CC-107A, B, C, D1, D2, E1, E2	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and NUREG-1482, Section 3.1.1.4.
VROJ21	RR28	1CC-289, 290, 291	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.
VROJ22	RR29	1MS-18, 19, 20	If exercising is not practicable during plant operation or cold shutdowns it may be limited to part stroke at cold shutdowns and full-stroke at refueling outages, per OM-10, GL 89-04, Position 1 and NUREG-1482, Section 4.1.4.

ENCLOSURE 1

SUMMARY OF CHANGES

New Valve Refueling Outage Justification	Existing Relief Request No.	Valve Number	Basis for Justification
VROJ23	RR30	1MS-80, 81, 82	Sample valve disassembly and inspection during refueling outages is permitted by OM-10, and GL 89-04, Position 2.
VROJ24	RR31	1RW-106, 107	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.
VROJ25	RR45	1RW-193, 194, 195, 196	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10 and GL 89-04, Position 1.
VROJ26	RR35	1RW-675, 676, 677	If exercising is not practicable during plant operation or cold shutdowns it may be limited to refueling outages, per OM-10.
VROJ27	RR48	1WT-382, 382, 387, 388	Sample valve disassembly and inspection during refueling outages is permitted by OM-10 and GL 89-04, Position 2.
VROJ28	RR47	1IA-116, 117	Valve Closure by leak test at a refueling frequency is permitted by OM-10 and NUREG-1482, Section 4.1.4.

XI) The following are changes to Section XI of the BVPS-1 IST Program "Valve Relief Requests."

- a) Valve Relief Request No. 1 (VRR1) was written for [1SI-1, 2] to disassemble and inspect during refueling outages, and to request relief from a partial stroke after the valve is reassembled. This VRR is existing RR13 in the current revision (Issue 2 Rev 14) of the IST Program. The basis for this request is the impracticality of the part-stroke testing.
- b) Valve Relief Request No. 2 (VRR2) was written for [1SI-48, 49, 50, 51, 52, 53] to request the use of an alternate test method for full stroke testing of the SI Accumulator Discharge Check valves. The basis for this relief is the SER for the Ft. Calhoun test method and NUREG-1482, Section 4.1.2. This VRR is existing RR20 in the current revision (Issue 2 Rev 14) of the IST Program.

ENCLOSURE 1

SUMMARY OF CHANGES

- c) Valve Relief Request No. 3 (VRR3) was written for [1RS-158, 160] to disassemble and inspect during refueling outages, and to request relief from a partial stroke after the valve is reassembled. This VRR is existing RR25 in the current revision (Issue 2 Rev 14) of the IST Program. The basis for this request is the impracticality of the part-stroke testing.
- d) Valve Relief Request No. 4 (VRR4) was written for [SOV-1EE-101, 102, 103, 104] to request to test the valve by starting the D/Gs. The basis for this is NUREG-1482, Section 3.4, "Skid-Mounted Components and Component Subassemblies." This VRR is existing RR36 in the current revision (Issue 2 Rev 14) of the IST Program.
- e) The following Relief Requests in the current revision (Issue 2, Rev 14) were deleted:
 - RR1 - OM-10 allows containment isolation valves to be tested per the Appendix J Testing Program.
 - RR7 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR9 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR11 - This RR was deleted in a previous revision.
 - RR18 - This RR was combined with RR16 and made into VROJ12.
 - RR23 - This RR was deleted in a previous revision.
 - RR27 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR32 - This RR was deleted in a previous revision.
 - RR33 - This RR was deleted in a previous revision.
 - RR34 - This RR was deleted in a previous revision.
 - RR37 - This RR was deleted in a previous revision.
 - RR38 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR39 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR40 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR41 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR42 - Per OM-10 it is permissible to assign a maximum permissible leakage rate for the entire penetration.
 - RR43 - This RR was deleted in a previous revision.
 - RR44 - This RR was deleted in a previous revision.
 - RR49 - OM-10, Section 4.2.1.8, has specific instructions for Rapid Acting Valves