

November 8, 2000

Mr. A. Alan Blind
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

SUBJECT: ONE-TIME RELIEF RELATED TO INSERVICE TESTING OF MAIN STEAM
SAFETY VALVES, INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
(TAC NO. MA9032)

Dear Mr. Blind:

In a letter dated April 18, 2000, Consolidated Edison Company of New York, Inc. (Con Edison) submitted a request for relief from certain requirements in the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Inservice Testing," for the Indian Point Nuclear Generating Unit No. 2 (IP2). Specifically, Con Edison requested the one-time relief from performing pressure setpoint tests in the as-found condition on three main steam safety valves before conducting maintenance. The inservice testing program at IP2 requires that the testing meet the requirements of the 1987 Edition of ASME/ANSI Standard OM (Part 1), "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices," which states that no maintenance, adjustment, disassembly, or other activity which could affect "as-found" set pressure or seat tightness data is permitted prior to testing.

The NRC staff reviewed the proposed request for one-time relief against the requirements of Section XI of the 1989 Edition of the ASME Code. The results are provided in the enclosed safety evaluation.

The NRC staff has concluded that compliance with the ASME Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), the staff authorizes the proposed alternative test for main steam safety valve nos. MS-45A, MS-45C, and MS-49A for the 2000 refueling outage.

A. Blind

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If you should have any questions, please contact Patrick Milano at 301-415-1457. This completes the NRC staff's action on TAC No. MA9032.

Sincerely,

/RA by Peter S. Tam for/

Marsha Gamberoni, Chief, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure: Safety Evaluation

cc w/encl: See next page

If you should have any questions, please contact Patrick Milano at 301-415-1457. This completes the NRC staff's action on TAC No. MA9032.

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cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

INSERVICE TESTING PROGRAM PLAN

REQUEST FOR RELIEF

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice testing (IST) of certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME 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 or relief, the applicant 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.

2.0 BACKGROUND

By letter dated April 18, 2000, Consolidated Edison Company of New York, Inc. (the licensee) submitted a request for a one-time relief from certain ASME Code IST requirements pertaining to testing of the plant main steam safety valves (MSSVs). The plant IST program requires that the testing meet the requirements of the 1987 OM Part 1 standard (herein referred to as Part 1). Specifically, the licensee seeks a one-time relief from performing as-found set pressure tests before maintenance is performed on three MSSVs. The following is a list of the plant MSSVs for which the licensee is seeking this one-time relief:

<u>VALVE I.D.</u>	<u>DESCRIPTION</u>
MS-45A	Main Steam Safety Valve
MS-45C	Main Steam Safety Valve
MS-49A	Main Steam Safety Valve

Enclosure

For the above described valves, the licensee is requesting one-time relief from the following testing requirement for pressurized-water reactor pressure relief valves:

Part 1, paragraph 7.3 No maintenance, adjustment, disassembly, or other activity which could affect "as-found" set pressure or seat tightness data is permitted prior to testing.

3.0 PROPOSED ALTERNATIVE TESTING

As an alternative to the above required testing, the licensee proposes to test the above three MSSVs after maintenance has been performed and prior to return to service from the 2000 refueling outage.

4.0 BASIS FOR RELIEF

The licensee states that prior to a primary-to-secondary steam generator tube leak that occurred on February 15, 2000, preparations were made to begin a refueling outage in June 2000. However, because of extensive maintenance activities associated with the steam generators following the February 15, 2000, event, the refueling operation was initiated without restarting the plant. The method the licensee utilizes for performing the as-found testing of the MSSVs is to test the valves, in situ, following plant shutdown and prior to entry into cold shutdown conditions. The present plant conditions do not permit in situ testing of the MSSVs under hot shutdown conditions, and the above three MSSVs are scheduled for maintenance during the current outage. The licensee states that compliance with the above requirement would result in hardship without a compensating increase in the level of quality or safety.

5.0 EVALUATION

The staff finds that performing the as-found MSSV testing prior to maintenance activities in accordance with Part 1 would result in unusual hardship without a compensating increase in quality or safety. To perform such tests would require that the licensee establish hot, pressurized system fluid conditions. To further evaluate the licensee's request, the staff reviewed the set pressure test data for the above three MSSVs collected for the six prior tests. Based on this review of the licensee's operating experience with these MSSVs and general industry experience with similar valves, it is not expected that significant degradation of these components would have occurred during the most recent operating period. Therefore, the absence of as-found set pressure test data in this case, is not expected to result in a significant loss of information needed to evaluate the operability of the above three MSSVs or to determine needed corrective actions for these and other MSSVs. Also, based on a discussion with the licensee, the staff determined that the Indian Point 2 MSSVs are welded onto the main steam piping, not flanged, such that it would not be possible to perform as-found testing by removing the valves and sending them to an offsite testing facility, prior to maintenance. Therefore, the staff finds that it is acceptable to perform the one-time testing of the above three MSSVs as the licensee proposes, after maintenance is performed and prior to return to service following the 2000 refueling outage.

6.0 CONCLUSION

The staff concludes that, pursuant to 10 CFR 50.55a(a)(3)(ii), the licensee's proposed alternative test is authorized for the 2000 refueling outage (one-time only) on the basis that compliance with Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Principal Contributor: G. Hammer

Date: November 8, 2000