

September 11, 2001

MEMORANDUM TO: Peter Tam, Acting Chief, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Guy S. Vissing, Senior Project Manager, Section 1 /RA/  
Project Directorate 1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: FORMAL DOCKETING OF INCOMING E-MAIL MATERIAL -  
RESPONSE TO QUESTIONS REGARDING THE TESTING OF ECCS  
PUMPS (TAC NO. MB2519)

The attached e-mail relates to the beyond scope issue BSI-F6, ITS 3.6.2.3, for  
FitzPatrick. This material should be placed into Docket No. 50-333.

Docket No. 50-333

Attachment: E-mail from Entergy Nuclear Operations

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G. Vissing  
G. Thomas

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NAME	GVissing	SLittle	PTam
DATE	8/20/01	8/30/01	9/5/01

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**From:** "Jones, Jerry" <JJones90@entergy.com>  
**To:** "gsv@nrc.gov" <gsv@nrc.gov>  
**Date:** 8/15/01 2:08PM  
**Subject:** RHR pump testing

Guy,

Andy asked me to send you this response to your e-mail about the RHR pump testing. It is a wordperfect attachment. I hope it answers the questions the reviewer posed. If not, please let me know. Thanks,  
Jerry Jones

<<3623>>

**CC:** "Halliday, Andrew" <AHallid@entergy.com>

Attachment

The RHR pumps will be required to be tested by both the ITS Surveillance Requirements and the IST Program. The RHR pumps are required to be tested by the IST Program every 92 days. The program requires all pumps to be tested. However, this requirement is not controlled by the ITS, in that the requirement could be changed without requiring a Technical Specifications change. The ITS also requires testing of the RHR pumps in three different Technical Specifications; ITS 3.5.1 (ECCS - Operating), 3.6.1.9 (RHR Containment Spray System), and 3.6.2.3 (RHR Suppression Pool Cooling). ITS SR 3.6.1.9.2 and SR 3.6.2.3.2 only require testing one of the two RHR pumps per loop. This is because only one pump per loop is required to be Operable, as stated in the ITS LCO Section of the Bases. This allowance (to only require one pump per loop to be Operable) is also consistent with the NUREG allowances for the similar Technical Specifications. ITS SR 3.5.1.7 requires a one RHR pump test, but both pumps per loop are required to be Operable, as stated in the ITS Bases. Thus, each RHR pump must be tested per SR 3.5.1.7 to demonstrate it meets the specified flow rate requirement. The NUREG has a dual pump test, since some plants ECCS analyses assume a dual pump flow rate (i.e., the combination of the two pumps in the loop must have a minimum flow rate). The JAFNPP ECCS analyses assume a single pump flow rate (i.e., each pump must have a minimum specified flow rate), as shown in CTS 4.5.A.3. The number of pumps column is meant to show how many pumps are tested together to demonstrate the flow rate requirement; it is not meant to specify the total number of pumps required to be tested. If the column meant how many total pumps are to be tested, then even the NUREG would be incorrect, since it says only to test 2 LPCI (i.e., RHR) pumps (out of the four total) and one Core Spray Pump (out of the two total). The reason the number of pumps column was changed in the JAFNPP submittal was due to the ECCS analyses that assumes a minimum single pump flow rate. Also, SR 3.5.1.7 is not modified by the use of the word "required," thus all pumps are required to be tested.

It was also noted that the description of how many RHR pumps per loop are required is located only in the Background section (which is consistent with the NUREG location). For clarity, the LCO section will be modified to specifically state both pumps per subsystem are required to be Operable.