



October 15, 2001

L-2001-233
10 CFR 50.4
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inservice Testing Program
Relief Request VR-23 - ASME Code Case OMN-2

References:

Letter from Anthony J. Mendiola (USNRC) to Oliver D. Kingsley (Exelon Nuclear Generating Company), Clinton Power Station, Unit 1 – Safety Evaluation for Alternative to 10 CFR 50.55a(f), Inservice Testing Requirements (TAC No. MB2532), dated September 5, 2001

Letter from J. W. Clifford (USNRC) to R. G. Lizotte (Northeast Nuclear Energy Company), Safety Evaluation for Relief Requests Associated with Second 10-Year Pump and Valve Inservice Testing Program, Millstone Nuclear Power Station, Unit No. 3 (TAC No. MA9336), dated February 2, 2001

Pursuant to 10 CFR 50.55a(a)(3)(i), Florida Power and Light Company (FPL) requests approval to incorporate Code Case OMN-2, Thermal Relief Valve Code Case, OM Code-1995, Appendix I, for use in the St. Lucie Units 1 and 2 third 10-year inservice testing program.

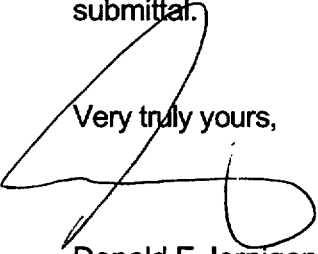
Relief Request VR-23 (Attachment 1) proposes relief from the requirements of American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI), Operation and Maintenance of Nuclear Power Plants, OM-1987, Part 1, Paragraph 3.3, related to periodic testing of ASME Class 2 and 3 thermal relief valves. This relief request is similar to relief requests approved by the NRC for Clinton Power Station on September 5, 2001, and the Millstone Nuclear Power Station Unit 3 on February 2, 2001.

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A copy of the Code Case OMN-2 (Attachment 2) is included for your information. Approval is requested by December 31, 2001. Please contact us if there are any questions about this submittal.

Very truly yours,



Donald E Jernigan
Vice President
St. Lucie Plant

DEJ/

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

REQUEST FOR RELIEF - VALVES

RELIEF REQUEST NO. VR-23

SYSTEM

Various – This is a generic relief request.

COMPONENTS

Class 2 and 3 thermal relief valves whose only over pressure function is to protect isolated components from fluid expansion caused by changes in fluid temperature.

CATEGORY

C

FUNCTION

These valves open to provide thermal relief to protect isolated components from fluid expansion caused by changes in fluid temperature.

PART 10 REQUIREMENT

Safety and relief valves shall meet the inservice test requirements of OM-1987 Part 10. (Paragraph 4.3.1)

BASIS FOR RELIEF

As-found bench testing of Class 2 and 3 pressure relief valves used in thermal applications presents an undue administrative burden to FPL without a commensurate gain in safety. FPL presently schedules valve tests on a sample basis per the OM-1987 Part 1 requirements. In the event of a failure, a sample expansion of additional valves, from the same group, are selected for testing. This approach creates scheduling difficulties in finding appropriate "windows" of opportunity to test expanded samples without incurring additional system unavailability. FPL is also forced to revise the scope of planned system outages to include contingent valve tests due to sample expansions. In many cases, additional non-required tests are performed on contingency valves in advance of a required valve test during unit outages. This is necessitated by the need to lessen the potential outage impact for testing additional valves after the maintenance window for that system has been completed.

REQUEST FOR RELIEF - VALVES

RELIEF REQUEST NO. VR-23

With regard to acceptability of the Code Case OMN-2, the Code Committee performed a review of the Nuclear Plant Reliability System (NPRDS) database to assess the quantity and type of thermal relief valve failures. The Code Committee determined that the failure rates of thermal relief valves are limited. The Code Committee determined that the low number of failure rates support the 10-year test or replacement frequency, and the elimination of sample expansion if the failure was discovered during testing.

ALTERNATE TESTING

As an alternative, FPL will adopt Code Case OMN-2 of the 1995 OM Code, Appendix I which states, "that in lieu of the requirements specified in ASME Code-1995, paragraphs I 1.3.5(a), (b), and (c) testing for Class 2 and Class 3 pressure relief devices whose only overpressure protection function is to protect isolated components from fluid expansion caused by changes in fluid temperature shall be performed once every 10 years on each device unless performance data indicates that more frequent testing is needed to assure device function. In lieu of test, the owner may replace these devices every 10 years unless performance data indicates more frequent replacement is needed to assure device function."

REQUEST FOR RELIEF - VALVES

RELIEF REQUEST NO. VR-23

OMN-2

This Case shall expire on July 31, 2001, unless previously annulled or reaffirmed.

**CODE CASE OMN-2
Thermal Relief Valve Code Case, OM Code-1995, Appendix I**

Inquiry: What alternative to ASME OM Code-1995, Appendix I, paras. 1.3.5(a), (b), and (c) may be used for Class 2 and Class 3 pressure relief valves, which are required to be tested per ASME OM Code-1995, Appendix I, para. I 1.1, whose only overpressure protection function is to protect isolated components from fluid expansion caused by changes in fluid temperature?

Reply: It is the opinion of the Committee that in lieu of the requirements specified in ASME OM Code-1995, paras. I 1.3.5(a), (b), and (c) testing for Class 2 and Class 3 pressure relief devices whose only overpressure protection function is to protect isolated components from fluid expansion caused by changes in fluid temperature shall be performed once every ten years on each device unless performance data indicates that more frequent testing is needed to assure device function. In lieu of test, the Owner may replace these devices every ten years unless performance data indicates more frequent replacement is needed to assure device function.