October 17, 2001

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT

REQUEST TO IMPLEMENT THE CHECK VALVE PORTION OF THE 1995 EDITION AND 1996 ADDENDA TO THE ASME CODE INCLUDING APPENDIX II, "CHECK VALVE CONDITION MONITORING PROGRAM" – RELIEF REQUEST RR-V-33a

Nuclear Management Company (NMC) requests approval for its Palisades Nuclear Plant to implement the check valve portion of the ASME OMa-1996 Code including Appendix II, "Check Valve Condition Monitoring Program." Approval is requested by January 31, 2002, in order to support the inservice testing of check valves scheduled during the refueling outage of 2003. It is proposed that implementation of the ASME OMa-1996 code and Appendix II be phased in for all check valves at the Palisades Nuclear Plant. Full implementation of the ASME OMa-1996 code will be completed by December 31, 2003. Therefore, in accordance with 10CFR50.55a(a)(3)(i), relief is being requested to implement the Check Valve Condition Monitoring Program on the proposed implementation schedule. The supporting relief request is attached.

SUMMARY OF COMMITMENTS

This letter contains one new commitment and no revisions to existing commitments.

The new commitment is:

> Full implementation of the ASME OMa-1996 code will be completed by December 31, 2003.

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Director, Engineering

CC Regional Administrator, USNRC. Region III
Project Manager, USNRC, NRR
NRC Resident Inspector - Palisades

A047

Attachment

Rec'd 01/14/02

ATTACHMENT

NUCLEAR MANAGEMENT COMPANY
PALISADES PLANT
DOCKET 50-255

October 17, 2001

Implementation of the Check Valve Portion of the 1995 Edition and 1996 Addenda to the ASME Code Including Appendix II, "Check Valve Condition Monitoring Program"

Relief Request RR-V-33a

3 pages

REQUEST FOR RELIEF
RR-V-33a

Pending Approval

Component ID	Class	Cat.	System	Description
All Check Valves	**All (1, 2, 3)**	**AC / C**	**Various**	**Various**

FUNCTION:

The safety-related functions for check valves are described in the Palisades Pump and Valve Inservice Testing (IST) Program. Not all check valves have both open and close safety functions.

TEST REQUIREMENT:

All applicable ASME/ANSI OMa-1988, Part 10 requirements for check valves.

BASIS:

In order to take advantage of the American Society of Mechanical Engineer's (ASME) and Nuclear Regulatory Commission's (NRC) improvement efforts in developing a performance-based code (versus the current prescriptive code requirements), relief is being requested to implement the ASME OM Code-1995 Edition through 1996 Addenda including Appendix II, "Check Valve Condition Monitoring Program," subject to the three modifications in 10CFR50.55a(b)(3)(iv). This is an approved and acceptable ASME Code alternative to testing check valves as set forth in ASME/ANSI OMa-1988, Part 10 section 4.3.2, "Exercising Tests for Check Valves." Relief is being requested in accordance with 10CFR50.55a(a)(3)(i) to implement the Condition Monitoring program on an extended schedule.

The proposed schedule for implementing the Appendix II Condition Monitoring program allows it to be phased in over one refueling cycle, to permit testing of valves that can only be safely tested during a refueling outage. This is the case for some of the check valves not currently bi-directionally tested. It will also allow sufficient time to establish the process, procedures, and valve groupings, which are necessary to implement the Appendix II condition monitoring program requirements. The implementation period requested is approximately two years and extends to December 31, 2003.

There are twenty-three check valves that are not currently tested in both the open and close directions, but will be bi-directionally tested following approval of this request. The initial evaluations performed will include those valves not currently bi-directionally tested. Bi-directional testing improves the capability to detect failures. This code update for check valves only is three years in advance of the required 10-year IST program Code update. This proposed alternative provides an acceptable level of quality and safety.

ALTERNATE TESTING:

Check Valves will be monitored by the condition monitoring approach adopting the requirements of Appendix II, "Check Valve Condition Monitoring Program," in the ASME OM Code-1995 Edition through 1996 Addenda; subject to the following modifications found in 10CFR50.55a(b)(3)(iv):

1. Check valve opening and closing functions will be demonstrated when flow testing or other examination methods (such as nonintrusive, or disassembly and inspection) are used.

REQUEST FOR RELIEF
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ALTERNATE TESTING: (continued)

2. The initial test interval for tests and associated examinations will not exceed two fuel cycles or three years, whichever is longer; any extension of this interval will not exceed one fuel cycle per extension with the maximum not to exceed 10 years; trending and evaluation of existing data will be used to make changes to the time interval between tests.

3. If the Appendix II condition monitoring program is discontinued (for a valve or group of valves), then the requirements of ISTC 4.5.1 through 4.5.4 will be implemented.

ACCEPTANCE CRITERIA:

Disassembly and inspection, non-intrusive test, and surveillance test acceptance criteria will be in accordance with station procedures.

REFERENCES:

1. 10 CFR Part 50 - Statements of Consideration for the Final Rule Effective November 22, 1999.

APPROVAL REFERENCES:

This request needs to be submitted and approved pursuant to 10 CFR 50.55a(a)(3)(i) because it allows a period of time for implementing bi-directional testing of check valve not currently tested.