September 27, 1991

Docket No. 50-302

Mr. Percy M. Beard, Jr.
Senior Vice President,
Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Operations
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Dear Mr. Beard:

SUBJECT: CRYSTAL RIVER UNIT 3 - RELIEF REQUEST FROM ASME CODE, SECTION XI, IWV 3422 (TAC NO. 79833)

By letter dated January 31, 1991, as supplemented May 16, 1991, you submitted for NRC review and approval an inservice testing program relief request to permit a one-time extension for the Type B and C local leak rate testing requirements for containment isolation valves until the end of Refuel 8. Along with this relief request, you submitted for NRC approval an exemption to Appendix J. The exemption to Appendix J will be forwarded to you by separate letter.

We have reviewed the request, and based on our review as summarized in the enclosed Safety Evaluation, herewith grant the requested relief. We have determined, in accordance with 10 CFR 50.55a(a)(3)(i), that leak rate testing of the valves in question during Refuel 8 would provide an acceptable level of quality and safety.

This completes our efforts on TAC No. 79883.

Sincerely,
(Original Signed By Rajender Auluck for)
Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE INSERVICE TESTING PROGRAM RELIEF REQUEST

FLORIDA POWER CORPORATION

CRYSTAL RIVER, UNIT 3

DOCKET NO. 50-302

1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a(g), requires that inservice testing (IST) of certain ASME Code Class 1, 2, and 3 valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (Code) and applicable addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to Subsections (a)(3)(i), (a)(3)(ii), or (g)(6)(i) of 10 CFR 50.55a. These regulations authorize the Commission to grant relief from ASME Code requirements upon making the necessary findings.

By letter dated January 31, 1991, as supplemented May 16, 1991, Florida Power Corporation (the licensee) requested a one-time exemption from the surveillance frequency requirements of 10 CFR Part 50, Appendix J, and relief from the related requirements of ASME Code, Section XI, and 10 CFR 50.55a. The exemption from Appendix J is evaluated under separate cover. The NRC staff's findings with respect to the relief requested as part of the licensee's IST Program are contained in this Safety Evaluation (SE).

2.0 DESCRIPTION AND DISCUSSION

In response to NRC Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," Position 10, "Containment Isolation Valve Testing," the licensee indicated their intention to leak test containment isolation valves (CIVs) per the requirements of 10 CFR Part 50, Appendix J, to comply with ASME Code, Section XI, IWV-3421 through IWV-3425. Appendix J requires Type C testing of containment isolation valves during refueling outages but in no case at intervals greater than 2 years. Code paragraph IWV-3422, "Frequency," requires that valve leak rate tests be conducted at least once every 2 years. Refueling outage 8 (Refuel 8) is scheduled to begin April 30, 1992. Valve leakage testing is presently required to be completed on a number of valves between March 1992 and May 1992. To accomplish the required testing within the 2-year interval would require an otherwise unnecessary shutdown. Delaying the testing until Refuel 8 would result in an approximately 2-month extension of the 2-year test interval.

2.1 Relief Request V-374

The licensee has requested relief from the test frequency requirements of IWV-3422 for a one-time extension of the leakage rate test interval from once every 2 years to an interval from the last test until the end of Refuel 8. The relief request is applicable to containment isolation valves and feedwater isolation valves as listed in the enclosure to the licensee's letter of May 16, 1991.

2.2 Alternative Testing

The licensee has proposed to complete the required leakage testing during Refuel 8, scheduled to start April 30, 1992. The testing will meet the requirements of 10 CFR Part 50, Appendix J, and ASME Section XI, IWV-3426 and IWV-3427(a), in accordance with the Crystal River-3 Inservice Testing Program.

2.3 Licensee's Basis for Relief

The licensee states in their January 31, 1991, letter:

1. The CR-3 Pump and Valve Program utilizes 10 CFR Part 50, Appendix J, Local Leak Rate Testing to fulfill the requirements of ASME Section XI, IWV-3422. The intent of Appendix J is to allow Type "C" testing (containment isolation valves) to be performed during refueling outages. CR-3 is requesting a one-time extension of the test interval to coincide with the next scheduled refueling outage.

2. The condition of the components is not expected to change during the requested extension period. This extension period is relatively short in comparison with the 2-year test interval.

3. The Type "C" testing performed during Refuel 7 (1990) provided favorable results with the measured leakage (approximately 10% of allowable leakage).

4. The integrity of the isolation valves' leak tightness will be verified by a Type "A" test (Integrated Leak Rate) scheduled for October 1991.

3.0 EVALUATION AND CONCLUSION

Based on the short extension requested, the low likelihood of a significant change in the condition of the components involved during the extension period, and the history of acceptable leak rate testing in the past, we conclude that leak rate testing of the valves in question during Refuel 8 would provide an acceptable level of quality and safety, and is acceptable. Therefore, the requested relief may be granted pursuant to 10 CFR 50.55a(a)(3)(i).

Principal Contributors: P. Campbell
H. Silver

Date: September 27, 1991