

William R. Kanda
Vice President - Nuclear

440-280-5579
Fax: 440-280-8029

June 24, 2002
PY-CEI/NRR-2646L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

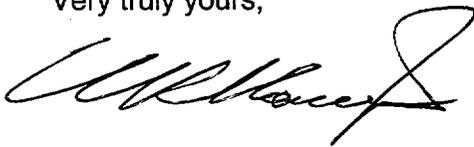
Perry Nuclear Power Plant
Docket No. 50-440
Submission of In-Service Testing Program Relief Request

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(a)(3)(i), a relief request for the Perry Nuclear Power Plant In-Service Testing Program is being requested. Attachment 1 contains Relief Request VR-12, which proposes implementation of alternate testing for the Emergency Service Water Inflatable Seal Check Valves. Relief Request VR-12 identifies the affected components, the applicable code requirements, the description and basis of the proposed relief request as well as the proposed alternate requirements. PNPP desires to implement Relief Request VR-12 during its second 120-month interval.

If you have any questions, or require additional information, please contact Mr. Gregory A. Dunn, Manager, Regulatory Affairs, at (440) 280-5305.

Very truly yours,



Attachment

cc: NRC Resident Inspector
NRC Project Manager
NRC Region III

A047

Valve Relief Request

VR-12

System: Emergency Service Water System (ESW)
Valves: P45-F006A, P45-F006B, P45-F007A, P45-F007B, P45-F009A, and P45-F009B
Category: AC
Class: 3
Function: Emergency Service Water Sluice Gate Inflatable Seal Instrument/Bottled Air Supply Check Valves

Test Requirements: OM(10) - 4.2.1, Valve Exercising Test
OM(10) - 4.3.2, Exercising Tests For Check Valves

Basis for Relief: The ESW Air Supply Check Valves are ½ inch check valves which open to supply air to the "A" Loop and "B" Loop ESW Sluice Gate Inflatable Seals. The purpose of the seals is to minimize the leakage of warm water from the Service Water System discharge past the ESW Sluice Gates and into the ESW forebay during the summer months. In the closed position, the check valves are designed to limit the amount of air leakage from the ESW Sluice Gate Inflatable Seals, when the seals are inflated, in the event of a loss of air supply. The check valves are only in service when the seals are inflated (a maximum of 5 months per year), and will not be in service during the remainder of the year.

The American Society for Mechanical Engineers (ASME), Operations and Maintenance [OM(10)] Code requires the air supply check valves to be exercised nominally every 3 months. As stated above, the seals are only inflated for 5 months a year. To perform the exercise test every 3 months, unnecessary system operation (sluice gate seal inflation) would be required during times when the seals would not be required to be inflated to maintain system operability. The OM(10) Code also requires leak testing of these check valves at least once every 2 years. The proposed alternate testing will require the valve exercise test and the leak test to be performed once a year prior to seal inflation.

Annual testing of the air supply check valves is consistent with the Nuclear Regulatory Commission (NRC) position documented in the Safety Evaluation for License Amendment 114, "Perry Nuclear Power Plant, Unit 1 – Issuance of Amendment RE: Emergency

Service Water Sluice Gates (TAC NO. MA9093)" (letter dated August 22, 2000). The Safety Evaluation states:

"Inflation and deflation of the seals will be accomplished by local manual action. The air supply is provided by the instrument air system and backed up by air bottles. Redundant check valves, located in series in the instrument air system, are provided for isolation and redundancy. When the seals are inflated, seal integrity will be verified twice daily. The redundant check valve integrity will be verified on an annual basis prior to inflating the seals."

The proposed annual, prior to inflation, test is reasonable based on eliminating unnecessary safety system operation (equipment challenges), and the limited duration of the ESW System with the inflatable seals inflated (5 months maximum per year). As a result, the proposed alternative will provide an acceptable level of quality and safety pursuant to 10 CFR50.55a(a)(3)(i).

Alternate Testing: Exercise testing and leak testing of the Emergency Service Water Sluice Gate Inflatable Seal Instrument/Bottled Air Supply Check Valves will be performed once a year prior to the seals being placed into service.