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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station OP1-17
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RELIEF REQUEST NO. RR-35 TO INSERVICE
INSPECTION PLAN FOR PUMP AND VALVE
OPERATIONAL TESTING FOR UNIT 1 AND UNIT 2 **Docket Nos. 50-387**
PLA-5543 **and 50-388**

Attached please find for your information, pursuant to 10 CFR 50.55a(a)(3)(i), Relief Request No. RR-35. This Relief Request is for relief from the ASME Code Section XI, OMa-1988 Part 10, Paragraph 4.3.2, "Exercising Tests for Check Valves" for Susquehanna SES Units 1 and 2 HPCI/RCIC Vacuum Tank Condenser Pump Discharge check valves. The Code requires these valves be exercised closed once per 92 days.

System design is such that no viable means exists for adequate closure testing of these valves to meet this requirement. These check valves are located on the discharge of the HPCI and RCIC Vacuum Tank Condenser pumps and provide the ASME Code boundary between the HPCI/RCIC pump suction and the discharge of the vacuum tank condenser pump. These check valves have a safety function to close to maintain HPCI/RCIC water inventory in the event of a design basis accident.

NRC Generic Letter 89-04 Position 2 establishes that disassembly and inspection of check valves may be used as a positive means of determining that a valve's disk will "full-stroke" open or of verifying closure capability, as permitted by ASME Code. Due to the scope of these inspections, the personnel hazards involved, and system operating restrictions, NRC Generic Letter 89-04 Position 2 established that valve disassembly and inspection may be performed during reactor refueling outages. The Generic Letter also establishes that a sample inspection plan for groups of up to four identical valves in similar applications may be employed within the NRC guidelines specified with Position 2. For these HPCI/RCIC check valves, a sampling group of four identical valves (two check valves from each unit) will be established for periodic disassembly and inspection.

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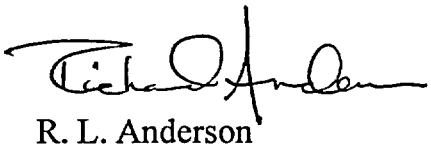
Full stroke operability will be verified by inspection during valve disassembly. PPL will disassemble, inspect, verify structural soundness of internal components, and manually exercise the disk through its full stroke for one different valve in the group once every refuel outage. The frequency of disassembly for each valve will be at least once every 96 months.

Relief Request No. RR-35 will be incorporated into the next revision of the Inservice Inspection Program for Pump and Valve Testing.

If you have any questions regarding this matter, please contact Mr. C. T. Coddington at (610) 774-4019.

Sincerely,



R. L. Anderson

Attachments

copy: NRC Region I
Mr. S. Hansell, NRC Sr. Resident Inspector
Mr. R. Janati, DEP/BRP
Mr. T. G. Colburn, NRC Sr. Project Manager
Mr. R. Osborne, Allegheny Electric

RELIEF REQUEST NUMBER 35

System: HPCI/RCIC

P&ID: M-150
M-155

Valves: 156F052 150F047

Category: C

Class: 2

Function: HPCI/RCIC Vacuum Tank Condenser Pump Discharge

Existing Test Requirement: Exercise valve closed once per 92 days.

Basis for Relief: These check valves are located on the discharge of the HPCI and RCIC Vacuum Tank Condenser pumps and provide the ASME Code boundary between the HPCI/RCIC pump suction and the discharge of the vacuum tank condenser pump. These check valves have a safety function to close to maintain HPCI/RCIC water inventory in the event of a design basis accident. System design is such that no viable means exists for adequate closure testing of these valves.

NRC Generic Letter 89-04 Position 2 establishes that disassembly and inspection of check valves may be used as a positive means of determining that a valve's disk will "full-stroke" open or of verifying closure capability, as permitted by ASME Code. Due to the scope of these inspections, the personnel hazards involved, and system operating restrictions, NRC Generic Letter 89-04 Position 2 established that valve disassembly and inspection may be performed during reactor refueling outages. The Generic Letter also establishes that a sample inspection plan for groups of up to four identical valves in similar applications may be employed within the NRC guidelines specified with Position 2. For these HPCI/RCIC check valves in the vacuum tank condenser pump discharge lines a sampling group of four identical valves (two check valves from each unit) will be established for periodic disassembly and inspection.

Alternate Testing: Full stroke operability will be verified by inspection during valve disassembly. The licensee will disassemble, inspect, verify structural soundness of internal components, and manually exercise the disk through its full stroke for one different valve in the group once every refuel outage. The frequency of disassembly for each valve will be at least once every 96 months.

RELIEF REQUEST NUMBER 35

System: HPCI/RCIC

P&ID: M-2150
M-2155

Valves: 256F052 250F047

Category: C

Class: 2

Function: HPCI/RCIC Vacuum Tank Condenser Pump Discharge

Existing Test Requirement: Exercise valve closed once per 92 days.

Basis for Relief: These check valves are located on the discharge of the HPCI and RCIC Vacuum Tank Condenser pumps and provide the ASME Code boundary between the HPCI/RCIC pump suction and the discharge of the vacuum tank condenser pump. These check valves have a safety function to close to maintain HPCI/RCIC water inventory in the event of a design basis accident. System design is such that no viable means exists for adequate closure testing of these valves.

NRC Generic Letter 89-04 Position 2 establishes that disassembly and inspection of check valves may be used as a positive means of determining that a valve's disk will "full-stroke" open or of verifying closure capability, as permitted by ASME Code. Due to the scope of these inspections, the personnel hazards involved, and system operating restrictions, NRC Generic Letter 89-04 Position 2 established that valve disassembly and inspection may be performed during reactor refueling outages. The Generic Letter also establishes that a sample inspection plan for groups of up to four identical valves in similar applications may be employed within the NRC guidelines specified with Position 2. For these HPCI/RCIC check valves in the vacuum tank condenser pump discharge lines a sampling group of four identical valves (two check valves from each unit) will be established for periodic disassembly and inspection.

Alternate Testing: Full stroke operability will be verified by inspection during valve disassembly. The licensee will disassemble, inspect, verify structural soundness of internal components, and manually exercise the disk through its full stroke for one different valve in the group once every refuel outage combination. The frequency of disassembly for each valve will be at least once every 96 months.