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Fred Dacimo
Vice President, Operations

March 11, 2003

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-03-042

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station O-P1-17
Washington, DC 20555-0001

Subject: ASME Section XI, Inservice Testing (IST) Program Relief Request No. 46

Dear Sir:

Pursuant to 10 CFR 50.55a(a)(3), Entergy Nuclear Operations, Inc. (ENO) hereby requests relief from the American Society of Mechanical Engineers / American National Standards Institute, Operation and Maintenance of Nuclear Power Plants, OM-1987, Part 1 (OM-1) requirement to test a minimum of 20% of Class 2 pressure relief valves within any 48 months.

ENO is required to test one (1) reactor coolant pump thermal barrier outlet pressure relief valve every 48 months based upon a total valve population of four in this group. One valve, 783A, was tested successfully in June 1998. A second valve in the group should have been tested during refueling outage 2R15, but was not. Because the test can only be performed with the reactor coolant pump secured, the next available opportunity to perform the test is during refueling outage 2R16. This refueling outage is currently scheduled for October 2004. A forced plant shutdown to perform the subject valve test would result in unusual hardship without a compensating increase in quality and safety.

ENO is requesting relief in accordance with 10 CFR 50.55a(a)(3)(ii), "Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety."

Attachment 1 contains the basis for this relief request.

Because the subject valve test becomes due in June 2003, ENO requests an expedited review by the NRC staff.

No new commitments are being made in this letter.

A-0417

Should you or your staff have any questions regarding this matter, please contact Mr. John McCann, Licensing Manager, at (914) 734-5074.

Very truly yours,



Mr. Fred Dacimo
Vice President
Indian Point Energy Center

Attachment

C: Mr. Hubert J. Miller
Regional Administrator-Region I
US Nuclear Regulatory Commission
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Mr. Patrick D. Milano, Senior Project Manager
Project Directorate I-1
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ATTACHMENT 1 TO NL-03-042

Relief Request No. 46

Entergy Nuclear Operations, Inc.
Indian Point Unit No. 2
Docket No. 50-247

RELIEF REQUEST BASIS

SYSTEM:

CCW

VALVES:

Relief Valves 783A, 783B, 783C, 783D

FUNCTION:

These one-inch, Category C, Reactor Coolant Pump (RCP) thermal barrier outlet relief valves open to provide an overpressure relief path for Containment Penetration O as discussed in the response to NRC Generic Letter 96-06. The valves are installed on the component cooling water lines downstream from each Reactor Coolant Pump to protect the downstream piping from overpressure. This condition could occur when cooling water return lines from the Reactor Coolant Pumps are isolated during accident conditions. The set pressure for these relief valves is 2485 psig.

TEST REQUIREMENTS:

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 1987 Edition (ASME/ANSI-1987), Part 1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices (OM-1), paragraph 1.3.4.1(b) states "All valves of each type and manufacture shall be tested within each subsequent 10 year period, with a minimum of 20% of the valves tested within any 48 months".

BASIS FOR RELIEF:

One valve (783A) from IST Relief Valve Group 21 (Valves 783A, 783B, 783C, 783D) was tested in June 1998. The next valve should have been tested within 48 months (June 2002) to meet the code frequency requirement. This surveillance, which can only be performed in an outage where the cooling water flow to the RCP thermal barrier can be secured, was not performed within the 48 month period. The purpose of this relief is to extend the surveillance to 76 months to coincide with the next scheduled refueling outage. This one-time extension of relief valve testing is acceptable for the following reasons:

1. A review of the as-found setpoint test history for these valves at both Indian Point Units 2 and 3 demonstrates proven relief pressure reliability. There have been 7 setpoint tests performed in the history of the plants with

only one setpoint test failure. For the one failure, the valve failed to lift within the required range (2411-2559 psig). This test occurred in May 1997 after approximately 20 years of plant operation. The valve was subsequently refurbished and successfully retested. The proposed one-time extension of the test frequency from 48 months to 76 months is not expected to affect the proven relief pressure reliability of these valves. No corrective maintenance work orders were found in the history files for the subject valves.

2. These four (4) reactor coolant pump thermal barrier cooling outlet relief valves were added to the inservice testing program scope in 1998 in response to NRC Generic Letter 96-06 evaluations regarding overpressure protection of piping penetrating containment. Operation of any one of the four valves would perform the function of depressurizing the thermal barrier cooling water piping inside containment. Prior to that, these original plant design valves were not tested because they had no identified safety function under OM-10, 1.1, Scope. The same valves serve a similar function at Indian Point Unit 3.

Given the proven test reliability and redundancy for these relief valves, there is no compensating increase in the level of quality and safety gained by requiring the plant to shutdown to perform a relief valve test.

ALTERNATE TESTING:

One untested valve from IST Relief Valve Group 21 (Valves 783A, 783B, 783C, 783D) will be tested at the next opportunity but no later than refueling outage 2R16, currently scheduled for October 2004.

REFERENCE:

NUREG-1482 Section 3.1