Entergy

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Fred Dacimo
Vice President, Operations

May 12, 2003

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-03-079

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 Nos. 47 and 48

Reference:
1. NRC (R.Gramm) to EOI (P. Hinnenkamp) Letter dated January 29, 2003 (TAC No. MB5834)
2. NRC (R. Laufer) to ENOI (M. Kansler) Letter dated June 20, 2002 (TAC No. MB3865)

Dear Sir:

Pursuant to 10 CFR 50.55a(a)(3)(i), the purpose of this letter is to request relief for the Indian Point Unit 2 ASME Section XI Inservice Testing Program. RR-47 requests relief from the American Society of Mechanical Engineers / American National Standards Institute, Operation and Maintenance of Nuclear Power Plants, OM-1987, Part 10 (OM-10) exercising requirements for check valves. Relief is requested to allow alternative valve disassembly and inspection on a frequency of once during each operating cycle in lieu of every refueling outage. RR-48 requests approval to extend the exercise interval for manual valves within the scope of OM-10 from every quarter to 2 years, as proposed in Federal Register Vol. 67, Number 187 dated September 26, 2002.

RR-47 is similar to RBS-VRR-005 at River Bend Station Unit 1, and was approved by the NRC in Reference 1. RR-48 is similar to VR-3 at Indian Point Unit No. 3, and was approved by the NRC in Reference 2.

The subject relief requests and bases are provided in Attachment 1.

No new commitments are being made in this letter.

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

Sincerely,

Mr. Fred R. Dacimo
Vice President, Operations
Indian Point Energy Center

Attachment

C: Mr. Hubert J. Miller
Regional Administrator-Region I
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475 Allendale Road
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Mr. Patrick D. Milano, Senior Project Manager
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ATTACHMENT 1 TO NL-03-079

Relief Request Nos. 47 and 48

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

RELIEF REQUEST BASIS

SYSTEM:

SW

VALVES:

Check Valves SWN-1, SWN-1-1, SWN-1-2, SWN-1-3, SWN-1-4, SWN-1-5.

FUNCTION:

These 14-inch, Category C, Service Water Pump discharge check valves are located at the discharge of each of six respective Service Water pumps and must open to allow flow to the Service Water System. They also have a safety function to close to prevent rotation of the non-operating pump.

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 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants" (OM-10), paragraph 4.3.2.4(c) states "As an alternative to the testing in (a) or (b) above, disassembly every refueling outage to verify operability of check valves may be used."

BASIS FOR RELIEF:

Relief is requested to disassemble and inspect the check valves on a frequency of once during each operating cycle (24 months) in lieu of once during each refueling outage to allow the surveillance requirement to be met with the Unit online. The following underscore the usefulness and applicability of an online testing approach:

1. The design of the system is such that any one pump can be isolated and the check valve disassembled with the Unit online.

2. Performing the inspection with the Unit online reduces outage complexity.

3. The check valves are located in an area where performance of the disassembly coupled with other major outage work increases the potential development of error-likely situations in work control and reassembly processes.

4. The check valves are located in an area where workers can be affected by cold weather conditions such that weather-conscious scheduling can reduce the impact on maintenance personnel performing the task.

5. An acceptable testing frequency can be maintained separately without being tied directly to a refueling outage. Inservice testing on a frequency that maintains the acceptable time period between testing activities during the operating cycle is consistent with the intent of OM-10 and GL 89-04.

6. The number of tests to be performed using either the outage or online frequency statements should be approximately equivalent. Thus, an equivalent level of quality and safety is maintained.

ALTERNATE TESTING:

Pursuant to 10 CFR 50.55a(a)(3)(i), Entergy proposes an alternative testing frequency for performing inservice testing of the valves identified above. The valves will be tested on a frequency of at least once during each operating cycle in lieu of once during each refueling outage as currently allowed by ASME/ANSI OM-10 paragraphs 4.3.2.2(e) and 4.3.2.4(c), and Generic Letter 89-04 Position 2.

REFERENCE:

ASME/ANSI OM-1987, PART 10

NRC Generic Letter 89-04, Guidance on Developing Acceptable Inservice Testing Programs

NUREG-1482, Guidelines for Inservice Testing at Nuclear Power Plants

SYSTEMS:

Chemical Volume & Control, Residual Heat Removal, Safety Injection, Main Steam, Service Water

VALVES:

Chemical Volume & Control System: 360, 370

Residual Heat Removal System: 732

Safety Injection System: 7352, 898

Main Steam System: MS-105-12, MS-105-9, MS-58A-1, MS-58B-1, MS-58C-1, MS-58D-1, MS-91B, MS-91D

Service Water System: SWN-27, SWN-27-1, SWN-29, SWN-30, SWN-31, SWN-31-1, SWN-32, SWN-33, SWN-38, SWN-39, SWN-4, SWN-5, SWN-56, SWN-60, SWN-70, SWN-70-1

FUNCTION:

These 29 manual valves are used to align components to separate headers, for cross-tie and isolation capability, and containment isolation among other functions.

TEST REQUIREMENTS:

Active Category A and B manual valves shall be tested nominally every 3 months, except as provided by paragraphs 4.2.1.2, 4.2.1.5, and 4.2.1.7 per OM-10, 1988 Addenda to OM-1987, Paragraph 4.2.1.1.

BASIS FOR RELIEF:

The extension of exercising manual valves from every quarter to every 5 years has been evaluated by the OM code committee, found acceptable, and incorporated into the 1999 Addenda and 2000 Addenda of the OM code. The NRC stated the following for 10CFR50.55(a) in the Federal Register/Vol. 67, Number 187 dated September 26, 2002:

(vi) Exercise interval for manual valves. Manual valves must be exercised on a 2-year interval rather than the 5-year interval specified in paragraph ISTC-3540 of the 1999 Addenda through the latest edition and addenda incorporated by

reference in paragraph (b) (3) of this section, provided that adverse conditions do not require more frequent testing.

ALTERNATE TESTING:

These manual valves will have an exercise interval of 2 years provided that adverse conditions do not require more frequent testing.

REFERENCE:

ASME/ANSI OM-1987, PART 10

Federal Register/Vol. 67, Number 187, September 26, 2002