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Date Generated: 04/05/2005

At: 1142

CR-04-09089**TITLE:** U2 & U3 MAIN STEAM SAFETY VALVE SET PRESSURE CONFIRMATION USES VENDOR M&TE, THAT MPS DID NOT VALIDATE THE VENDORS V&V PROCESS.**UNIT:** 2 **STATUS:** ASSIGNED **SUBMITTED:** 10/07/2004 1505 **SCREENED:** 10/07/2004 1625**CATEGORY:** ENGINEERING **DISCOVERY PROCESS:** MGRSITEENG**INITIATOR:** PERRY, DAVID M(5274)**FOLLOW-UP?:** N **DISCOVERY METHOD:** EXOV (10/07/2004 0611)**CRED?:** N **CONTACT NAME:** **RELATED CR:** CR-04-09086**LOCAL ID:** M22-MS-242 **SYSTEM:** 2316**DESC:** #2 STEAM GENERATOR SAFETY RELIEF VALVE**RELATED DOCUMENT:****DOC TITLE:****DETAIL:**

DURING A RECENT NRC INSPECTION IT WAS IDENTIFIED THAT MILLSTONE POWER STATION DID NOT VALIDATE THE VENDORS METHODOLOGY FOR THE DETERMINATION OF THE VALVE CONSTANT "K". THE "K" VALUE IS USED IN THE DETERMINATION OF THE MSSV SET PRESSURE WHEN USING THE HYDROSET.

BOTH MILLSTONE UNIT 2 AND 3 HAVE DRESSER (CONSOLIDATED) BASE MODEL NUMBER 3707R MAIN STEAM SAFETY VALVES (MSSVS). BOTH UNITS MSSVS HAVE R ORIFICE AND USE THE SAME DISC. BOTH UNITS USE THE DRESSER 1566-2 HYDROSET TESTING DEVICE FOR MSSV SET PRESSURE CONFIRMATION. THE HYDROSET IS USED TO CONFIRM THE SET PRESSURE OF THE MSSVS TO MEET TECHNICAL SPECIFICATION AND IST PROGRAM REQUIREMENTS.

THE ORIGINAL "K" VALUE WAS IDENTIFIED AS BEING INCORRECT IN DRESSER 10CFR PART 21 FILE 90-01. MILLSTONE POWER STATION ADDRESSED THIS PART 21 UNDER CONTROL ROUTING 7887. AT THAT TIME MILLSTONE POWER STATION REVISED THE APPLICABLE PROCEDURES TO INCORPORATE THE NEW "K" VALUE (MILLSTONE UNIT 2 WAS SHUTDOWN AT THE TIME OF THE PART 21 AND IDENTIFIED A NUMBER MSSVS THAT WERE OUT OF TOLERANCE. THESE MSSV WERE RESET USING THE NEW "K" VALUE). WHEN THE NEW "K" VALUE WAS PROVIDED TO THE SITE, IT WAS BELIEVED THAT IT WAS NOT NECESSARY TO VALIDATE THE VENDORS V&V PROCESS.

DURING RECOVERY THE NRC QUESTIONED MILLSTONE UNIT 3 ON, "DID THE ASSIST DEVICE ONLY PROVIDE A REPRESENTATION OF SIMMERING ON THE VALVE, AND NOT ACTUALLY THE SET PRESSURE?" MILLSTONE UNIT 3 RESPONDED TO THIS ISSUE BY PERFORMING SET PRESSURE CONFIRMATION TESTING USING A MSSV THAT WAS AT WYLE LABS. THE SET PRESSURE TESTING CONSISTED OF TESTING THE VALVE ON A TEST STAND USING A LIMITED TRAVEL STEAM LIFT SET PRESSURE METHOD (STANDARD METHOD FOR DETERMINING SET PRESSURE POST VALVE OVERHAUL AND PERMITTED BY THE CODE), THEN PERFORMED SET PRESSURE CONFIRMATION USING A HYDROSET AND THEN PERFORMED ADDITIONAL LIMITED TRAVEL STEAM LIFT SET PRESSURE METHOD TO CONFIRM SET PRESSURE. THIS TESTING IS DOCUMENTED IN TECHNICAL EVALUATION M3-EV-98-0183 REV 0. THE TECHNICAL EVALUATION CONCLUDED THAT USE OF THE HYDROSET DID PROVIDE ACCURATE SET PRESSURE RESULTS.

BASED ON THE ABOVE INFORMATION COMPONENT ENGINEERING DOES NOT BELIEVE THERE ARE OPERABILITY ISSUES WITH THE MSSVS ON UNIT 2 OR UNIT 3. THE NEW VALVE CONSTANT "K", PROVIDED TO MILLSTONE POWER STATION AS PART OF THE VENDORS APPENDIX B PROGRAM. MILLSTONE POWER STATION ALSO HAS IN HOUSE OPERATIONAL EXPERIENCE, THAT SHOWS THE USE OF THE HYDROSET TO CONFIRM MSSV SET PRESSURE PROVIDES AN ACCURATE METHOD OF DETERMINING SET PRESSURE OF MSSVS.

AT THIS TIME MPS HAS DETERMINE IT WOULD BE PRUDENT TO VALIDATE THE VENDORS V&V PROCESS ON THE HYDROSET 1566-2 FOR USE ON MPS MSSVS.

ACTIONS TAKEN:

INITIATED THIS ISSUE REPORT, DISCUSSED ISSUE WITH SITE ENGINEERING MANAGER AND U2 & U3 DAY SHIFT MANAGER

RECOMMENDED ACTIONS:

COMPONENT ENGINEERING REVIEW VENDOR VERIFICATION AND VALIDATION OF 1566-2 HYDROSET FOR USE ON MILLSTONE UNIT 2 & 3 MAIN STEAM SAFETY VALVES.

SCREENING DETERMINED ISSUE IMPACTS:**PERSONNEL SAFETY:** N **EXPLAIN:****PLANT SAFETY:** N **EXPLAIN:****PLT EQUIP/TR REQ'D:** N **EXPLAIN:**

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OPERABILITY: Y EXPLAIN: SEE ISSUE DETAIL SCREENER CHANGED "N" TO "Y" TO ENSURE SM REVIEW. SEE SCREENER COMMENTS THAT SUPPORT THE POSITION THAT THE MSSV VALVES ARE OPERABLE.

REPORTABILITY: N EXPLAIN: SEE ISSUE DETAIL

REACT MGMT: N EXPLAIN:

ENVIRONMENTAL: N EXPLAIN:

PLT/EQUIP RELIAB: N

COMMENTS:

U-2 SCREENER AND U-2 SM DISCUSSED ISSUE WITH THE INITIATOR WHO REITERATED THAT THERE IS NO OPERABILITY ISSUE WITH THE U-2 MSSV. THE MAJOR POINTS AS DESCRIBED IN THE ISSUE DETAIL AND DURING THE DISCUSSION THAT SUPPORT THIS POSITION IS THAT THE "K" VALUE USED BY DRESSER IS PROVIDED UNDER AN APPROVED QUALITY PROGRAM AND THERE IS A PROVEN CORRELATION BETWEEN THE HYDROSET RESULTS AND RESULTS OBTAINED ON THE TEST STAND. THIS ISSUE WAS RAISED IN PART, DUE TO OPERATIONAL EXPERIENCE AT OTHER PLANTS THAT REVEALED MSSV SETPOINT PROBLEMS THAT WERE CAUSED BY TESTING METHODS THAT ARE NOT EMPLOYED AT MILLSTONE.

U3 SCREEN-U3 CONCURS WITH THE ISSUE DETAIL THAT CONCLUDES THERE IS NO OPERABILITY ISSUE WITH THE U3 MSSVS AS THE TESTING UNDER THE VENDORS PROVIDED ACCURATE SET PRESSURE RESULTS AND WAS PERFORMED UNDER APPENDIX B PROGRAM. THE TECHNICAL EVALUATION, M3-EV-98-0183 REV 0, DOCUMENTED THIS TESTING.

SM REVIEWS:

OPERABILITY: CONDITION DOES NOT AFFECT SSC OPERABILITY.

REPORTABILITY: NO

COMMENTS:

NO OPERABILITY ISSUES IDENTIFIED. UNCLEAR WHY THERE IS ANY QUESTION AS TO THE STRENGTH OF THE VENDOR'S APP B PROGRAM. SEE SCREENER COMMENTS.

DISPOSITION: DISP DATE: 10/08/2004 AR#: SIG LVL: N ISSUE OWNER: DUE DATE: SCHED REF: NA CR MODE: NA TR #: CLOSED TO: CR NUMBER: CR-04-09086 CRED: N MRFF: N OD: N RD: N SDP: N RWK: N OE: N RCE/ERT: N COMP ACT: N

CRT COMMENTS: