

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

April 12, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

Enclosed is a revision log to supplement TVA's March 27, 1985 transmittal of the revised Watts Bar Nuclear Plant Inservice Testing (IST) program summary for pumps and valves.

If you have any questions concerning this matter, please get in touch with K. Mali at FTS 858-2682.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer
J. A. Domer
Nuclear Engineer

Sworn to and subscribed before me
this 12th day of April 1985.

Paulette H. White
Notary Public

My Commission Expires 8-24-88

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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ENCLOSURE

ADDITIONS TO PREVIOUS PROGRAM

1. Fuel Oil Transfer Pumps		
2. Valves:	1CKV02.667	1BYV32.298
	1CKV03.815 B	1BYV32.308
2FCV67.146	1CKV03.814 A	1BYV32.288
2FCV67.147	1CKV03.8185	1CKV33.714
OFCV70.194 B	1FSV30.135	1ISV33.713
OFCV70.197 A	1FSV30.134	1CKV43.N0001
1ISV78.557	1ISB52.500	1CKV43.N0002
1ISV78.558	1ISB52.501	1CKV43.N0026
1ISV78.560	1ISB52.502	1CKV43.N0030
1ISV78.561	1ISB52.203	1FSV43.250
1ISV84.5305	1ISB52.504	1FSV43.251
1FCV82.160 A.B	1ISB52.505	1FSV43.287
1FCV82.161 B.A	1ISB52.506	1FSV43.288
1FCV82.170 A.A	1ISB52.507	1FSV43.307
1FCV82.171 B.A	1CKV62.5195	1FSV43.309
1FCV82.190 A.B	1CKV62.523 A	1FSV43.310
1FCV82.191 B.B	1CKV62.530 B	1FSV43.318
1FCV82.200 A.B	1CKV62.697	1FSV43.319
1FCV82.201 B.B	1FCV62.138B	1FSV43.325
2FCV82.220 A.A	1CKV63.528A	1FSV43.341
2FCV82.221 B.A	1CKV63.530B	1FSV43.342
2FCV82.230 A.A	OFCV67.151	1FCV67.146
2FCV82.231 B.A	OFCV67.152B	1FCV67.147
2FCV82.250 A.B	1FCV67.22	2FCV67.22
2FCV82.251 B.B	1FCV67.24	2FCV67.24
2FCV82.260 A.B	1FCV67.81	2FCV67.81
2FCV82.261 B.B	1FCV67.82	2FCV67.82

3. The following relief request have been withdrawn 53, 14, 26, 27, 44, 64, 54, 55, 3, 4, 5, 24, 38, 49.
4. Program has been updated to include additional requirements of the 1980 Edition, winter 1981 addenda to the code.
5. Valve 70-703 has been recategorized from C.ACT to AC.ACT.
6. UHI rupture disk has been incorporated into the program.
7. Valve FCV-62-76 has been recategorized from A.PAS to A.ACT.

6. The following valves have been recategorized from AC.ACT to C.ACT due to the fact that the piping these check valves protect is qualified to a higher pressure than the RCS itself.

1-CKV-63-581	1-CKV-63-588
1-CKV-63-586	1-CKV-63-589
1-CKV-63-587	

7. The following check valves were originally thought to be normally open valves which would close to provide containment integrity. Subsequent investigation has revealed that these valves are spring loaded to be maintained in the closed position and have been recategorized from AC.ACT to AC.PAS.

1-CKV-31-3378	1-CKV-61-533
1-CKV-31-3407	1-CKV-61-692

8. The following valves were reclassified from B.ACT to B.PAS because they are normally maintained in an open deenergized condition and must remain in that condition in order to fulfill their safety-related purpose.

1-FCV-63-67	1-FCV-63-98
1-FCV-63-80	1-FCV-63-118

9. The following valves in the control air system were reclassified from B.ACT to B.PAS because they were not ". . . required to perform a specific function in shutting down a reactor to the cold shutdown condition or in mitigating the consequences of an accident." Therefore, they are not within the scope of article IWV-1100.

0-FCV-32-82	0-FSV-32-61
0-FCV-32-85	0-FSV-32-87

10. The following check valves in the component cooling system were reclassified from C.ACT to C.PAS because the equipment they serve (thermal barrier coolers) are not safety related, therefore, the valves are not safety related and do not fall within the scope of article IWV-1100.

1-CKV-70-671	1-CKV-70-682A
1-CKV-70-681A	1-CKV-70-682B
1-CKV-70-681B	1-CKV-70-682C
1-CKV-70-681C	1-CKV-70-682D
1-CKV-70-681D	

11. Valve LCV-70-63, makeup supply to the component cooling system surge tank, was reclassified from B.ACT to B.PAS because it was deemed to be a "valve used for system control" and as such was exempt under article IWV-1200(a).

12. Valve 1-FCV-74-32, RHR heat exchanger bypass valve, was reclassified from B.ACT to B.PAS because it was deemed to be a "valve used for system control" and as such was exempt under article IWV-1200(a). Additionally, this valve is isolated during normal operation by the hand control valves (HCV) located immediately upstream of it in the line coming from each train.

13. The following valves were reclassified from C.ACT to C.PAS when it was ascertained that their function was as thermal relief instead of pressure relief. These valves are installed across valves which may be closed during normal operation and relief back to the system itself instead of relieving to a tank, the atmosphere, or another system.

62-518	1-67-550	67-566C	67-573C
67-539A	2-67-550	67-566D	67-573D
67-539B	67-566A	67-537A	67-582A
0-67-550	67-566B	67-537B	67-582B
67-582C	70-556B	0-70-607	70-683B
67-582D	70-561A	0-70-634	70-683C
70-521	70-561B	0-70-635	70-683D
70-527A	70-565A	70-645	70-719
70-527B	70-565B	70-660	70-729A
70-538	70-570A	70-668	70-729B
70-551A	70-570B	70-675A	70-729C
70-551B	70-578	70-675B	70-741
70-556A	70-584	70-683A	70-746

14. Relief Request RR.25 has been added requesting relief from quantitative analysis of valves with stroke time of less than or equal to 2 seconds (fast acting valves).

15. Relief Requests RR.09, RR.10, and RR.11 have been added due to the addition of the fuel oil transfer pumps to the program. These requests propose an alternative method of meeting the intent of Section XI based on the physical restraints associated with these pumps.

16. Relief Request RR.21 has been added to reflect a change in the nature of the RCS power operated reliefs to a totally enclosed valve. This makes it impossible to fully comply with paragraph IWV-3300 regarding observation of the accuracy of the remote position indicators on a biannual basis. An alternative test method is proposed.

17. Relief Request 24 has been added due to information regarding the affects of full speed stroking of the UHI hydraulic isolation valves. This request proposes a part speed stroke test during operation using the maintenance operator and a full speed stroke test at refueling outages using the normal operator at a time when the system is depressurized.

18. Cold shutdown justification CS.13 has been added because of the addition of the Post-Accident Sampling Facility. The isolation valves which penetrate containment do not receive a containment isolation signal. Therefore, the valves are maintained in a closed deenergized condition necessitating testing in cold shutdown in lieu of during operation.

19. Cold shutdown justification CS.25 was added because of the addition of certain ERCW valves to the program. These valves affect multiple safety systems and their failure to reopen would adversely affect multiple systems.

20. Cold shutdown justifications CS.24 and CS.30 were added because of the possibility of accidentally draining large quantities of water into the reactor building sump during testing of the sump isolation valves.

21. Relief Request RR.20 has been modified to include a request to allow part stroke testing of check valves coincide with leak testing of the valves in order to avoid multiple testing of the same component.

CHANGES TO PREVIOUS PROGRAM

1. The spent fuel pit pumps and high pressure fire protection pumps have been judged to not meet the requirements of IWP-1100 in that they do not ". . . perform a specific function in shutting down a reactor or in mitigating the consequences of an accident . . ." and are, therefore, not within the scope of Section VI. The fire pumps are adequately tested by the WBN technical specifications.

In accordance with the above judgement, the following valves were reclassified from B.ACT to B.PAS:

FCV-26-3	FCV-26-16	CKV-26-550	CKV-78-509
FCV-26-6	FCV-26-17	CKV-26-555	CKV-78-510
FCV-26-8	FCV-26-126	CKV-26-557	CKV-78-586
FCV-26-13	FCV-26-127	CKV-26-559	
FCV-26-15			

2. The following valves were removed from the system and no longer exist as a result of inspections which were required by IE Bulletin 83-03:

CKV-67-509A	CKV-67-514A
CKV-67-509B	CKV-67-514B
CKV-67-512A	CKV-67-517A
CKV-67-512B	CKV-67-517B

3. The following valves associated with BIT to BAT recirculation and BIT injection have been recategorized as B.PAS because the modifications involved in deletion of the BIT have resulted in these valves being deenergized and maintained in their safe condition:

1-FCV-63-38	1-FCV-63-41
1-FCV-63-39	1-FCV-63-42
1-FCV-63-40	1-CKV-63-570

The above-mentioned modifications also deleted the only flow path available with instrumentation available to measure BAT pump flow. This has resulted in the addition of Relief Request RR.08.

4. RCS head vent valves previously listed in the program submittal with Relief Request 50 have been finalized and this has resulted in the revised Relief Request RR.21 regarding the test method of the two throttle valves. These valves are controlled by a manual position rather than normal actuator. Therefore, stroke time is irrelevant. RR.21 proposes to verify the valves properly respond to their manual positioner instead.

5. Charging pump suction to RWST isolation valves 1-LCV-62-135A and 1-LCV-62-136B have been further evaluated resulting in moving these valves to cold shutdown testing, in lieu of testing during operation due to the likelihood of boron concentration changes in the charging pumps were allowed to take suction from the RWST during operation. This is reflected in cold shutdown justification CS.17.

FORMAT CHANGES TO PREVIOUS PROGRAM

1. The complete valve number, including unit designator, valve type and train designator is now being used to track the valves in the program. This change was made to facilitate cross referencing of information at the plant level.

2. Relief Requests and justification for testing during cold shutdowns in lieu of during operation have been separated into two separate appendices. Relief Requests are listed in Appendix C and begin with RR. Cold shutdown justifications are listed in Appendix D and begin with a CS. The following table provides a cross reference between identifying numbers used in the April 1982 program and the current program.

<u>April 1982</u>	<u>Current</u>	<u>April 1982</u>	<u>Current</u>
001	RR.02	040	RR.17/RR.18
002	RR.01	041	RR.18
003	Withdrawn	042	RR.18/RR.23
004	Withdrawn	043	CS.18
005	Withdrawn	044	Withdrawn
006	RR.05	045	RR.19
007	RR.03	046	RR.20
008	RR.04	047	CS.27
009	RR.07/RR.06	048	CS.26
010	RR.05	049	Withdrawn
011	RR.12/RR.13	050	RR.26
012	CS.01	051	CS.28
013	CS.03	052	CS.29
014	Withdrawn	053	Withdrawn
015	CS.02	054	Withdrawn
016	CS.04	055	Withdrawn
017	CS.06	056	RR.22
018	CS.07	057	RR.22
019	CS.04	058	CS.32
020	CS.05	059	CS.31
021	CS.08	060	CS.33
022	CS.09/CS.10	061	CS.33
023	CS.11	062	CS.34
024	Withdrawn	063	RR.20
025	CS.12	064	Withdrawn
026	Withdrawn		
027	Withdrawn		
028	CS.14		
029	CS.15		
030	CS.16		
031	RR.14		
032	RR.15		
033	CS.19		
034	CS.20		
035	CS.21		
036	CS.22		
037	CS.23		
038	Withdrawn		
039	RR.16		