Murray Selman
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 737-8116

October 6, 1986

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

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. Steven A. Varga, Project Director
PWR Project Directorate No. 3
Division of PWR Licensing - A
Office of Nuclear Reactor Regulation

Dear Mr. Varga:

By letter dated February 16, 1984, and subsequent revision by letter dated July 18, 1986, we transmitted the "Inservice Testing Program Summary for the interval July 1, 1984 through June 30, 1994." Within the program summary submittal, we noted that, should certain ASME B&PV Code Section XI requirements prove to be impractical due to unforeseen circumstances, subsequent relief from that requirement would be requested.

Such a circumstance has recently been identified. In accordance with the provision noted above, we are transmitting a new relief request as Attachment A to this letter. The provisions of this relief request have been implemented. Should the staff identify an acceptable alternative approach during the course of their review, we will consider implementing any such recommendation at that time.

Should you or your staff have any questions, please contact us.

Very truly yours,

Murray Selman

cc: Senior Resident Inspector
Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

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ATTACHMENT A

Inservice Testing Program Summary
for the Interval
July 1, 1984 through June 30, 1994

General Relief Request F

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
October, 1986

GENERAL RELIEF REQUEST F

Systems: Main Steam, Boiler Feedwater

Valves: All active category B valves in the above systems identified as requiring some type of Section XI testing (stroke time, exercise, etc.) within the IST program summary.

Function: As applicable for the specific valves described above.

Test Requirement: IWV-3200

"IWV-3200 VALVE REPLACEMENT, REPAIR AND MAINTENANCE

When a valve or its control system has been replaced or repaired or has undergone maintenance [1] that could affect its performance, and prior to the time it is returned to service, it shall be tested to demonstrate that the performance parameters which could be affected by the replacement, repair, or maintenance are within acceptable limits.

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[1]Adjustment of stem packing, removal of the bonnet, stem assembly, or actuator, and disconnection of hydraulic or electrical lines are examples of maintenance that could affect valve performance parameters."

Basis For Relief:

The valves identified are valves in the main steam and feedwater systems that cannot be exercised quarterly during normal power operation and for which valve specific relief from the quarterly exercise requirement to a cold shutdown or refueling frequency has been requested.

Paragraph IWV-3200 could possibly be interpreted such that if a packing adjustment to any one of these valves is required during power operation, a full or part stroke exercise and/or stroke time test/exercise might be required following such an adjustment. Exercising valves in the steam and feedwater systems at power results in a high potential for tripping the reactor due to steam/feedwater flow perturbations. For the MSIVs, exercising at power is totally precluded because the control systems are arranged such that as soon as the valve disk leaves the full open position a unit trip signal is generated.

Packing adjustments are necessary from time to time to minimize packing leakage that can impact such aspects of plant operation as: personnel protection, ALARA considerations, housekeeping, flood protection, safe and reliable power operation.

Considerable experience in this area using qualified maintenance and operations personnel leads us to conclude that exercising/timing a valve immediately following packing adjustment is not warranted. To do so requires substantially reducing plant load, thereby effecting a steam/feedwater flow perturbation that increases the potential for inadvertant reactor trip, and unnecessary and unwarranted cycling of the unit. Packing adjustments at power are made in small increments with the intent of reducing leakage, not eliminating it completely. This approach helps to minimize the potential for binding associated with overtightening.

Currently, Technical Specifications require the performance of a turbine stop/control valve cycling test on a periodic frequency. This test requires a load reduction to about 30% reactor power, thus permitting either full or part stroke exercising of most valves in the steam and feedwater systems at that time.

Accordingly, we are requesting that any IWV-3200 testing of these valves that may be required as a result of packing adjustments performed with the reactor at power be deferred until the next turbine stop/control valve test required by the technical specifications. For those valves that cannot be exercised at power, such as the MSIVs (MS-1's) without causing a unit trip, stroke testing would be deferred until the next planned outage of sufficient duration.

Alternate Testing

Valve testing required as a result of packing adjustment performed with the reactor at power may be deferred until the next turbine stop/control valve test required by technical specifications for valves in the main steam and feedwater systems that can be stroke tested in conjunction with the turbine stop/control valve test. For valves that can only be tested with the reactor shut down (i.e., when stroking the valve at power would result in a reactor trip), any testing required as a result of packing adjustment will be deferred until the next planned outage of sufficient duration, not to exceed the Section XI required test frequency (i.e., quarterly, cold shutdown, refueling, etc.).