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Mark Murray
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*****Long Text Object Identification*****

Notification 000020459689 Long text

04/21/2010 11:32:25 NUCLEARNOT (NUCLEARNOT)

Notification submitted by: Edley Giles 856-339-2271 ENTNBU\NUITG:

CONDITION DESCRIPTION/LOCATION (THE INAPPROPRIATE ACTION AND ITS NEGATIVE EFFECT/INCLUDE A DETAILED LOCATION DESCRIPTION):##

The required ASME Section XI Pressure Testing for the buried Auxiliary Feedwater piping required by the ER-AA-330-001 and OU-AA-335-015 procedures were not performed. The ISI program manager has found no evidence of testing. These procedures implement the requirements of 10CFR50.55a. The system pressure test boundary drawing (S2-SPT-336-0) identifies the piping as YARD piping not buried piping. This is applicable to both Salem Units. The Salem unit 1 piping however is being replaced and will be hydro tested to code requirements prior to being placed in service.

ACTIVITIES, PROCESSES, PROCEDURES INVOLVED:

ER-AA-330-001, Section XI pressure Testing ?

OU-AA-335-015, VT-2 Visual Examination

WHY DID CONDITION HAPPEN?

The system pressure test boundary drawing (S2-SPT-336-0) identifies the piping as YARD piping not buried piping. However, it is commonly understood that it is buried pipe.

CONSEQUENCES:

The implementation of the ASME Section XI pressure testing may not have been completed in the current inspection interval as required. However, the in-service testing required by S2.OP-ST.AF-0007, In-service Testing of Aux Feed Water Valves Modes 4-6, infers that the functional requirements of the test have been met. The test records pump dp and pump flow. The flow measurement occurs down stream of the buried section of piping. The pump dp is taken at pump. This ST uses the 21 and 22 AF pumps. Review of the IST data taken (12 STs since May 1997) shows that the pump dp and flows have been constant (considering instrument and instrument reading inaccuracies) since 1997. No ST has exceeded its upper or lower IST limits. The Quarterly STs provide evidence that the 21 and 22 AF pumps are not degraded. The ability of the AF pumps to achieve required flow downstream of the buried piping section at a consistent pump dp provides assurance that the buried piping system condition has not changed. The test also confirms the code requirement that flow is not impaired.

Salem Unit 1 piping is out of service, is being replaced, and will be subject to Code required pressure testing prior to being placed in service.

AFW System TS 3.7.1.2 requires that the AFW system flow paths shall be operable. TS 4.0.5 requires ASME Class 1, 2 and 3 components to be tested in accordance with ASME XI. Since the ASME test was apparently missed, we should treat this as a missed TS surveillance of the buried pipe flow path. TS Surveillance Requirement 4.0.3 states that if the surveillance is not performed within its specified frequency (in this case two (2) cycles), a delay of up to the limit of the specified frequency is allowed IF a risk evaluation is performed for the delay greater than 24 hours and the risk impact is managed.

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REQUIREMENTS IMPACTED:

ER-AA-330-001, Section XI pressure Testing
OU-AA-335-015, VT-2 Visual Examination

ADVERSE PHYSICAL CONDITIONS:

No adverse physical condition.

WHO WAS NOTIFIED:

Engineering Director

KNOWLEDGEABLE INDIVIDUALS:

Tim Giles, Ed Maloney, Tom Roberts, H. Berrick, E. Villar

REPEAT OR SIMILAR CONDITION:

No

IMMEDIATE ACTIONS AND RECOMMENDED ACTIONS:

Engineering to provide risk assessment for Unit 2 Auxiliary Feedwater buried pipe to allow delay in test until next refueling outage (2R18). The risk impact associated with this evaluation shall be managed.

Perform required In-service Pressure Testing in next outage on unit 2 (2R18). Buried piping on unit 1 will be tested prior to returning to service during current 1R20 refueling outage.

Revise U1 & U2 Salem In-service Inspection Program Long Term Plans to identify all buried Section XI piping systems and required testing.

Review Hope Creek Section XI Pressure Testing Program for similar conditions.