



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401-1927
Telephone (612) 330-5500

October 29, 1992

10 CFR Part 2
Section 2.201

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Reply to a Notice of Violation Contained in NRC Inspection
Report No. 50-263/92010 Concerning Failure to Perform Inservice
Testing in Accordance with Technical Specification Requirements

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, our reply to the Notice of Violation contained in your letter of September 30, 1992 is provided as Attachment A. In addition, your letter requested that our reply to the Notice of Violation address the unresolved issues and inspection followup items identified in the body of Inspection Report 50-263/92010. A discussion of our position and plans concerning these unresolved issues and open items is provided as Attachment B.

Please contact us if you have any questions or wish further information concerning this matter.

Leon R. Eliason
Vice President
Nuclear Generation

c: Regional Administrator, Region III, NRC
Senior Resident Inspector, Monticello Site, NRC
NRR Project Manager, NRC
J Silberg

Attachment: (A) Reply to Notice of Violation

(B) Discussion of Unresolved Issues and Open Items Identified in
IR 50-263/92010

92105002

REPLY TO NOTICE OF VIOLATION

Violation:

Monticello Technical Specification 4.15.B.1 requires that inservice testing of the residual heat removal service water (RHRSW), emergency service water (ESW), and emergency diesel generator-emergency service water (EDG-ESW) systems be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, except where relief has been granted by the commission, or where alternate testing is justified in accordance with Generic Letter (GL) 89-04.

(Note: Five examples were cited in the violation. Each example is addressed individually below.)

This is a Severity Level IV violation (Supplement I).

Example a.

ASME Code, Section XI, IWP-3110, "Reference Values", states reference values shall be at points of operation readily duplicated.

Contrary to the above, inservice test procedures 0187-1, dated 9/16/91; 0187-2, dated 9/16/91; 0255-11-III-3, dated 9/3/92; and 0255-11-III-4, dated 3/3/92, tested the #11 and #12 EDG-ESW and #13 and #14 ESW pumps using pump reference curves instead of specific reference values without relief from the code (263/92010-05a).

Reason for the Violation:

The latest revision of the second ten-year interval IST Program was based on the 83 Edition through Summer 83 Addenda of the ASME Code, Section XI, which included the wording quoted in the violation. We acknowledge that a relief request should have been submitted during the second ten-year interval to address the use of pump reference curves. However, we believed until recently that OMa-1988 Part 6, which was being utilized as the governing code for our third ten-year interval program, permitted the use of reference curves. Since development of the third ten-year program was in progress during 1991, and since it was known the second ten-year program would soon be superseded, preparation and submittal of a relief request on this issue was not given high priority during the second ten-year IST interval.

Corrective Action Taken and Results Achieved:

We have incorporated the code intent by eliminating the use of all pump reference curves in the implementing procedures.

Corrective Action To Be Taken To Avoid Further Violation:

1. Administrative Work Instruction 4AWI-09.04.01 (ASME Section XI Pump and Valve Testing) will be revised to state that reference curves shall not be implemented unless an associated relief request has been approved by the NRC. This will be completed by December 15, 1992.
2. In addition, the IST Program for the third ten-year interval is being revised to delete the paragraph describing the use of reference curves. This will be completed by December 15, 1992.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example b.

ASME Code, Section XI, IWV-3522, "Exercising Procedure", states valves shall be full-stroke exercised to the position required to fulfill their function. GL 89-04, Position 1, states that any flow rate less than the maximum required accident condition flow through the valve is considered a partial-stroke test.

Contrary to the above, for inservice test procedures 0255-11-III-3, dated 3/3/92, and 0255-11-III-4, dated 3/3/92, the acceptance criterion for full flow testing ESW check valves ESW-17, 18, 23, and 24 was less than the maximum flow required by the system (55 versus 118 gpm) (263/92010-5b).

Reason for the Violation:

We acknowledge that 118 gpm is the maximum design flow for the system and that the test was run at a lower value, typically 80 gpm. The flow through the subject check valves goes to equipment in the Reactor Building and the EFT Building. The acceptance criterion of 55 gpm represents that portion of the 118 gpm total design flow directed to the Reactor Building branch of the system.

The 55 gpm acceptance value was selected in earlier years because the flow could only be measured at the Reactor Building Branch. Recently, new instrumentation was added that permits measurement of total flow through the system, however, an error occurred in that the 55 gpm acceptance criteria in the procedure was not changed to 118 gpm.

Corrective Action Taken and Results Achieved:

1. The inservice test was revised to operate the system at a flow greater than or equal to 118 gpm. The test has been satisfactorily completed.
2. The IST program and corresponding inservice tests were reviewed to verify that other check valves that open in conjunction with safety related pumps are in compliance with the full-stroke exercise requirements of GL 89-04 Position 1. No other deficiencies of this type were found.

Corrective Action To Be Taken To Avoid Further Violation:

This example will be discussed during Engineering and Technical Staff continuing training to heighten awareness of the need to ensure test procedures are properly updated to reflect new test methods or instrumentation.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example c.

ASME Code, Section XI, IWV-3522, "Exercising Procedure", states valves shall be full-stroke exercised to the position required to fulfill their function. GL 89-04, Position 3, states that verification that a valve is in the closed position can be done by visual observation, by an electrical signal initiated by a position indicating device, by observation of appropriate pressure indication in the system, by leak testing, or by other positive means.

Contrary to the above, inservice test procedure 0255-05-IA-1, dated 6/10/92, did not specifically verify, by means specified by GL 89-04, Position 3, that the RHRSW pump discharge check valves RHRSW 1-1, 1-2, 1-3 and 1-4 would close when the opposite RHRSW pump was operating (263/92010-05c).

Reason for the Violation:

The subject valves were being backflow tested by ensuring full flow could be delivered by the parallel RHRSW pump. In response to Question 21 in the Minutes of the Public Meetings on Generic Letter 89-04, the NRC states:

when verifying the closure capability of the check valves on the discharge of parallel pumps, achievement of the required safety flow rate from one running pump with the idle pump's discharge check valve providing the barrier for recirculation flow would be considered an acceptable test configuration.

Therefore, we believed we were in full compliance with the Position 3 guidance.

With respect to the question raised by the NRC inspection team concerning the potential for reverse rotation of the idle RHRSW pump, we agree that it would be prudent to check for this condition while conducting the test.

Corrective Action Taken and Results Achieved:

1. The test procedure was revised to clarify the specific step where the check valve closure exercise test is satisfied.
2. We have added an additional step to the test procedure directing the operator to verify the idle pump is not rotating in reverse while the parallel pump is operating. Testing has confirmed that no RHRSW pumps experience reverse rotation when idle while the parallel pump is operating.
3. A review of similar parallel pump and discharge check valve systems for this concern was performed and the applicable test procedures were amended as appropriate. Testing was conducted as necessary to confirm that reverse rotation of the idle pump did not occur.

Corrective Action To Be Taken To Avoid Further Violation:

None

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example d.

ASME Code, Section XI, IWV-1100, "Scope", states valves required to perform a specific function in shutting down the reactor to the cold shutdown condition or mitigate the consequences of an accident should be inservice tested.

Contrary to the above, manual valves RHRSW 3-1, 3-2, 3-3, 3-4, 21-1, 21-2, 21-3, 21-4, ESW 3-1, 3-2, 3-19, 3-20, which were required to perform a specific function in shutting the reactor down to a cold shutdown condition or mitigating the consequences of an accident, were not included in the inservice testing (IST) program, dated 4/30/90 (263/92010-05d).

Reason for the Violation:

The root cause of this violation was a misinterpretation of ASME Section XI Article IWV-1000 regarding inclusion of manual valves in the IST program. It was believed by NSP, as well as many other utilities, that manual valves were not required to be included in the testing program. We now recognize that the valves noted in the violation should have been included in the IST program.

As a point of clarification, RHRSW 3-3 and 3-4, which are listed in the violation, do not exist. In addition, we believe the violation example meant to refer to valves ESW-19 and ESW-20 in lieu of ESW 3-19 and ESW 3-20.

Corrective Action Taken and Results Achieved:

1. The valves RHRSW 3-1, 3-2, 21-1, 21-2, 21-3, 21-4, ESW 3-1, 3-2, 19 and 20 have been satisfactorily exercised and added to the IST implementing procedures. All of the corresponding inservice tests have been revised to exercise these valves quarterly. In the case of RHRSW 21-1, 2, 3, and 4, the inservice test was revised to show that the existing valve exercise test performed satisfies a Section XI requirement.
2. The omission of these valves was also reported to the NRC via Licensee Event Report 92-12-00, dated September 23, 1992. As part of the corrective actions for that event, plant procedures were reviewed to identify other Class 1, 2, or 3 manual valves that have to be repositioned to perform a specific function in shutting down the reactor to a cold shutdown condition or in mitigating the consequences a design basis accident. No other manual valves were found that met this criteria.

Corrective Action To Be Taken To Avoid Further Violation:

1. This example will be discussed during Engineering and Technical Staff continuing training to assure that personnel are aware of the applicability of ASME Section XI to manual valves meeting the criteria of IWV-1100.
2. In addition, the IST Program for the third ten-year interval is being revised to add these valves to the program. This will be completed by December 15, 1992.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example e.

ASME Code, Section XI, IWV-3417, "Corrective Action", states if a valve fails to exhibit the required change of valve stem or disc position, then corrective action shall be initiated. IST administrative procedure 4 AWI-09.04.01, Section 4.8.5, states if abnormal operation is identified, Form 3107 and Form 3108 shall be completed.

Contrary to the above, on May 20, 1991, unacceptable test results obtained during the performance of 0255-05-IA-4(5) for valves CV-1728 and CV-1729 were not documented and evaluated in accordance with Form 3107 and Form 3108 (263/92010-05e)

On April 25, 1992, unacceptable test results obtained during the performance of 0187-1 for ESW-EDG #11 pump vibration were not documented and evaluated in accordance with Form 3107 and Form 3108 (263/92010-05f).

Reason for the Violation:

The failure to complete Forms 3107 and 3108 was an oversight caused by inadequate training. In both cases, the personnel involved believed that the test procedures and, in the case of 11 EDG-ESW pump, associated maintenance documents provided adequate documentation of the resolution of the problems noted during testing. The personnel involved did not recognize that our procedures required Forms 3107 and 3108 to be completed in addition to the normal test and maintenance documentation.

It should be noted that in both cases, even though Forms 3107 and 3108 were not completed, appropriate operability determinations, followup investigations, and corrective actions were performed.

Corrective Action Taken and Results Achieved:

Forms 3107 and 3108 have been completed for CV-1728, CV-1729 and 11 EDG-ESW pump.

Corrective Action To Be Taken To Avoid Further Violation:

This example will be discussed during Engineering and Technical Staff Continuing Training to improve awareness of the need to complete Forms 3107 and 3108 in these situations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

DISCUSSION OF UNRESOLVED ISSUES AND
OPEN ITEMS IDENTIFIED IN IR 50-263/92010

The following is our response to the two unresolved items and the two followup items identified in the SWSOPI report.

Unresolved Issue 263/92010-01 (Calculation of Heat Loads for the RHR/CS Pump Rooms):

The calculation for the RHR/CS pump room heat load has been completed, assuming a river temperature of 90°F and 24 gpm service water flow to the room cooler. This calculation indicates that the room temperature will remain below 140°F for the duration of the design basis accident.

Inspection Followup Item 263/92010-02 (RHR Heat Exchanger Heat Transfer Coefficient):

The overall heat transfer coefficient for the RHR heat exchangers will be recalculated using the 90°F service water temperature. The RHR heat exchanger efficiency test will be revised prior to its next normally scheduled usage. In the interim, a hold has been placed on the procedure to ensure this concern is properly addressed. All related procedures and documents will be updated. A review of the past testing demonstrated that the system far exceeded the required design value of heat transfer coefficient for both RHR heat exchangers and does not represent an operability issue.

Unresolved Issue 263/92010-03 (System Flow Balancing):

Measurement of ESW flow to each of the Reactor Building loads will be performed during the 1993 refueling outage to provide additional assurance that previously completed system design verification activities and current preventive maintenance practices ensure the system is capable of performing its intended function.

Inspection Followup Item 263/92010-04 (IST Program Implementation):

The third ten-year IST program was not implemented primarily due to our uncertainty over the acceptability of implementing the program prior to receiving a NRC Safety Evaluation Report approving the associated third ten-year interval relief requests. We also believed it would be acceptable to continue following our second ten-year interval program until such time as the third ten-year interval program was approved. It was not until this question was raised by SWSOPI Inspection Team that we learned that we should have implemented the new program, with the exception of relief requests not previously approved, by the May 31, 1992 date.

We have just received an advance copy of the NRC Safety Evaluation Report dated September 24, 1992, which provides NRC comments regarding our third ten-year Inservice Testing Program. In that report, several of our relief requests were denied. We are currently assessing the NRC and Brookhaven National Laboratory comments contained in the report in order to determine what changes to our program and/or our relief requests are required. Numerous procedure revisions will be necessary before we can fully implement the new program. Based on the amount of work remaining, we intend to meet the following implementation schedule:

1. The Third Ten-year Interval IST program, with the exception of the relief requests denied in the September 24, 1992 NRC Safety Evaluation report, will be fully implemented prior to the 1993 refueling outage. The refueling outage is currently scheduled to begin on January 27, 1993.
2. With respect to the relief requests that have been denied, we will complete our assessment of your questions and comments and either submit revised relief requests or perform the testing in compliance with the applicable ASME Code, Section XI requirements and Generic Letter 89-04 guidance. Where relief was withheld pending additional information or where revised relief requests are needed, it is our intention to submit the necessary information and/or revised relief requests promptly to ensure that our program can be fully reviewed and approved prior to the 1993 refueling outage.

Although not mentioned in the Inspection Report, a related matter we wish to address involves the outstanding NRC comments concerning our second ten-year interval program. These comments were received very near the end of the program period, and it was suggested by the NRC that, in lieu of revising the second ten-year program (which would soon expire anyway), we address the comments in our third ten-year program. However, we did not receive the comments in time to act on the suggestion, since the third ten-year program was submitted before the comments were received. We will address the outstanding second ten-year program comments, as well as comments concerning Revision 0 of our third ten-year program, when we prepare Revision 1 to the third ten-year program.

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NER:9211050002 DOC.DATE: 92/10/29 NOTARIZED: NO DOCKET #
 ACIL:50-263 Monticello Nuclear Generating Plant, Northern States 05000263
 AUTH.NAME AUTHOR AFFILIATION
 ELIASON,L.R. Northern States Power Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920930 ltr re violations noted in insp rept
 50-263/92-10. Corrective actions: code intent incorporated by
 eliminating use of all pump reference curves in implementing
 procedures. R
I
D
S

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 10
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: ~~NRR/MORISSEAU~~ 05000263

	RECIPIENT ID CODE/NAME	COPIES LTTR	ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	ENCL	
	PD3-1 PD	1	1	LONG, W	1	1	A D
INTERNAL:	AEOD	1	1	AEOD/DEIB	2	2	D
	AEOD/DSP/TPAB	1	1	AEOD/TTC	1	1	D
	DEDRO	1	1	NRR MORISSEAU, D	1	1	S
	NRR/DLPQ/LHFBPT	1	1	NRR/DLPQ/LPEB10	1	1	
	NRR/DOEA/OEAB	1	1	NRR/DREP/PEPB9H	1	1	
	NRR/PMAS/ILRB12	1	1	NUDOCS-ABSTRACT	1	1	
	OE DIR	1	1	OGC/HDS1	1	1	
	<u>REG FILE</u> 02	1	1	RGN3 FILE 01	1	1	
EXTERNAL:	EG&G/BRYCE, J.H.	1	1	NRC PDR	1	1	
	NSIC	1	1				

NOTES: 1 1 R

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK.
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 23 ENCL 23



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401-1927
Telephone (612) 330-5500

October 29, 1992

10 CFR Part 2
Section 2.201

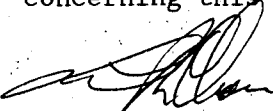
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Reply to a Notice of Violation Contained in NRC Inspection
Report No. 50-263/92010 Concerning Failure to Perform Inservice
Testing in Accordance with Technical Specification Requirements

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, our reply to the Notice of Violation contained in your letter of September 30, 1992 is provided as Attachment A. In addition, your letter requested that our reply to the Notice of Violation address the unresolved issues and inspection followup items identified in the body of Inspection Report 50-263/92010. A discussion of our position and plans concerning these unresolved issues and open items is provided as Attachment B.

Please contact us if you have any questions or wish further information concerning this matter.


Leon R. Eliason
Vice President
Nuclear Generation

c: Regional Administrator, Region III, NRC
Senior Resident Inspector, Monticello Site, NRC
NRR Project Manager, NRC
J. Silberg

Attachment: (A) Reply to Notice of Violation

(B) Discussion of Unresolved Issues and Open Items Identified in
IR 50-263/92010

03007

9211050002 921029
PDR ADOCK 05000263
PDR
Q

JEAN

REPLY TO NOTICE OF VIOLATION

Violation:

Monticello Technical Specification 4.15.B.1 requires that inservice testing of the residual heat removal service water (RHRSW), emergency service water (ESW), and emergency diesel generator-emergency service water (EDG-ESW) systems be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, except where relief has been granted by the commission, or where alternate testing is justified in accordance with Generic Letter (GL) 89-04.

(Note: Five examples were cited in the violation. Each example is addressed individually below.)

This is a Severity Level IV violation (Supplement I).

Example a.

ASME Code, Section XI, IWP-3110, "Reference Values", states reference values shall be at points of operation readily duplicated.

Contrary to the above, inservice test procedures 0187-1, dated 9/16/91; 0187-2, dated 9/16/91; 0255-11-III-3, dated 9/3/92; and 0255-11-III-4, dated 3/3/92, tested the #11 and #12 EDG-ESW and #13 and #14 ESW pumps using pump reference curves instead of specific reference values without relief from the code (263/92010-05a).

Reason for the Violation:

The latest revision of the second ten-year interval IST Program was based on the 83 Edition through Summer 83 Addenda of the ASME Code, Section XI, which included the wording quoted in the violation. We acknowledge that a relief request should have been submitted during the second ten-year interval to address the use of pump reference curves. However, we believed until recently that OMa-1988 Part 6, which was being utilized as the governing code for our third ten-year interval program, permitted the use of reference curves. Since development of the third ten-year program was in progress during 1991, and since it was known the second ten-year program would soon be superseded, preparation and submittal of a relief request on this issue was not given high priority during the second ten-year IST interval.

Corrective Action Taken and Results Achieved:

We have incorporated the code intent by eliminating the use of all pump reference curves in the implementing procedures.

Corrective Action To Be Taken To Avoid Further Violation:

1. Administrative Work Instruction 4AWI-09.04.01 (ASME Section XI Pump and Valve Testing) will be revised to state that reference curves shall not be implemented unless an associated relief request has been approved by the NRC. This will be completed by December 15, 1992.
2. In addition, the IST Program for the third ten-year interval is being revised to delete the paragraph describing the use of reference curves. This will be completed by December 15, 1992.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example b.

ASME Code, Section XI, IWV-3522, "Exercising Procedure", states valves shall be full-stroke exercised to the position required to fulfill their function. GL 89-04, Position 1, states that any flow rate less than the maximum required accident condition flow through the valve is considered a partial-stroke test.

Contrary to the above, for inservice test procedures 0255-11-III-3, dated 3/3/92, and 0255-11-III-4, dated 3/3/92, the acceptance criterion for full flow testing ESW check valves ESW-17, 18, 23, and 24 was less than the maximum flow required by the system (55 versus 118 gpm) (263/92010-5b).

Reason for the Violation:

We acknowledge that 118 gpm is the maximum design flow for the system and that the test was run at a lower value, typically 80 gpm. The flow through the subject check valves goes to equipment in the Reactor Building and the EFT Building. The acceptance criterion of 55 gpm represents that portion of the 118 gpm total design flow directed to the Reactor Building branch of the system.

The 55 gpm acceptance value was selected in earlier years because the flow could only be measured at the Reactor Building Branch. Recently, new instrumentation was added that permits measurement of total flow through the system, however, an error occurred in that the 55 gpm acceptance criteria in the procedure was not changed to 118 gpm.

Corrective Action Taken and Results Achieved:

1. The inservice test was revised to operate the system at a flow greater than or equal to 118 gpm. The test has been satisfactorily completed.
2. The IST program and corresponding inservice tests were reviewed to verify that other check valves that open in conjunction with safety related pumps are in compliance with the full-stroke exercise requirements of GL 89-04 Position 1. No other deficiencies of this type were found.

Corrective Action To Be Taken To Avoid Further Violation:

This example will be discussed during Engineering and Technical Staff continuing training to heighten awareness of the need to ensure test procedures are properly updated to reflect new test methods or instrumentation.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example c.

ASME Code, Section XI, IWV-3522, "Exercising Procedure", states valves shall be full-stroke exercised to the position required to fulfill their function. GL 89-04, Position 3, states that verification that a valve is in the closed position can be done by visual observation, by an electrical signal initiated by a position indicating device, by observation of appropriate pressure indication in the system, by leak testing, or by other positive means.

Contrary to the above, inservice test procedure 0255-05-IA-1, dated 6/10/92, did not specifically verify, by means specified by GL 89-04, Position 3, that the RHRSW pump discharge check valves RHRSW 1-1, 1-2, 1-3 and 1-4 would close when the opposite RHRSW pump was operating (263/92010-05c).

Reason for the Violation:

The subject valves were being backflow tested by ensuring full flow could be delivered by the parallel RHRSW pump. In response to Question 21 in the Minutes of the Public Meetings on Generic Letter 89-04, the NRC states:

when verifying the closure capability of the check valves on the discharge of parallel pumps, achievement of the required safety flow rate from one running pump with the idle pump's discharge check valve providing the barrier for recirculation flow would be considered an acceptable test configuration.

Therefore, we believed we were in full compliance with the Position 3 guidance.

With respect to the question raised by the NRC inspection team concerning the potential for reverse rotation of the idle RHRSW pump, we agree that it would be prudent to check for this condition while conducting the test.

Corrective Action Taken and Results Achieved:

1. The test procedure was revised to clarify the specific step where the check valve closure exercise test is satisfied.
2. We have added an additional step to the test procedure directing the operator to verify the idle pump is not rotating in reverse while the parallel pump is operating. Testing has confirmed that no RHRSW pumps experience reverse rotation when idle while the parallel pump is operating.
3. A review of similar parallel pump and discharge check valve systems for this concern was performed and the applicable test procedures were amended as appropriate. Testing was conducted as necessary to confirm that reverse rotation of the idle pump did not occur.

Corrective Action To Be Taken To Avoid Further Violation:

None

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example d.

ASME Code, Section XI, IWV-1100, "Scope", states valves required to perform a specific function in shutting down the reactor to the cold shutdown condition or mitigate the consequences of an accident should be inservice tested.

Contrary to the above, manual valves RHRSW 3-1, 3-2, 3-3, 3-4, 21-1, 21-2, 21-3, 21-4, ESW 3-1, 3-2, 3-19, 3-20, which were required to perform a specific function in shutting the reactor down to a cold shutdown condition or mitigating the consequences of an accident, were not included in the inservice testing (IST) program, dated 4/30/90 (263/92010-05d).

Reason for the Violation:

The root cause of this violation was a misinterpretation of ASME Section XI Article IWV-1000 regarding inclusion of manual valves in the IST program. It was believed by NSP, as well as many other utilities, that manual valves were not required to be included in the testing program. We now recognize that the valves noted in the violation should have been included in the IST program.

As a point of clarification, RHRSW 3-3 and 3-4, which are listed in the violation, do not exist. In addition, we believe the violation example meant to refer to valves ESW-19 and ESW-20 in lieu of ESW 3-19 and ESW 3-20.

Corrective Action Taken and Results Achieved:

1. The valves RHRSW 3-1, 3-2, 21-1, 21-2, 21-3, 21-4, ESW 3-1, 3-2, 19 and 20 have been satisfactorily exercised and added to the IST implementing procedures. All of the corresponding inservice tests have been revised to exercise these valves quarterly. In the case of RHRSW 21-1, 2, 3, and 4, the inservice test was revised to show that the existing valve exercise test performed satisfies a Section XI requirement.
2. The omission of these valves was also reported to the NRC via Licensee Event Report 92-12-00, dated September 23, 1992. As part of the corrective actions for that event, plant procedures were reviewed to identify other Class 1, 2, or 3 manual valves that have to be repositioned to perform a specific function in shutting down the reactor to a cold shutdown condition or in mitigating the consequences a design basis accident. No other manual valves were found that met this criteria.

Corrective Action To Be Taken To Avoid Further Violation:

1. This example will be discussed during Engineering and Technical Staff continuing training to assure that personnel are aware of the applicability of ASME Section XI to manual valves meeting the criteria of IWV-1100.
2. In addition, the IST Program for the third ten-year interval is being revised to add these valves to the program. This will be completed by December 15, 1992.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example e.

ASME Code, Section XI, IWV-3417, "Corrective Action", states if a valve fails to exhibit the required change of valve stem or disc position, then corrective action shall be initiated. IST administrative procedure 4 AWI-09.04.01, Section 4.8.5, states if abnormal operation is identified, Form 3107 and Form 3108 shall be completed.

Contrary to the above, on May 20, 1991, unacceptable test results obtained during the performance of 0255-05-IA-4(5) for valves CV-1728 and CV-1729 were not documented and evaluated in accordance with Form 3107 and Form 3108 (263/92010-05e)

On April 25, 1992, unacceptable test results obtained during the performance of 0187-1 for ESW-EDG #11 pump vibration were not documented and evaluated in accordance with Form 3107 and Form 3108 (263/92010-05f).

Reason for the Violation:

The failure to complete Forms 3107 and 3108 was an oversight caused by inadequate training. In both cases, the personnel involved believed that the test procedures and, in the case of 11 EDG-ESW pump, associated maintenance documents provided adequate documentation of the resolution of the problems noted during testing. The personnel involved did not recognize that our procedures required Forms 3107 and 3108 to be completed in addition to the normal test and maintenance documentation.

It should be noted that in both cases, even though Forms 3107 and 3108 were not completed, appropriate operability determinations, followup investigations, and corrective actions were performed.

Corrective Action Taken and Results Achieved:

Forms 3107 and 3108 have been completed for CV-1728, CV-1729 and 11 EDG-ESW pump.

Corrective Action To Be Taken To Avoid Further Violation:

This example will be discussed during Engineering and Technical Staff Continuing Training to improve awareness of the need to complete Forms 3107 and 3108 in these situations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

DISCUSSION OF UNRESOLVED ISSUES AND
OPEN ITEMS IDENTIFIED IN IR 50-263/92010

The following is our response to the two unresolved items and the two followup items identified in the SWSOPI report.

Unresolved Issue 263/92010-01 (Calculation of Heat Loads for the RHR/CS Pump Rooms):

The calculation for the RHR/CS pump room heat load has been completed, assuming a river temperature of 90°F and 24 gpm service water flow to the room cooler. This calculation indicates that the room temperature will remain below 140°F for the duration of the design basis accident.

Inspection Followup Item 263/92010-02 (RHR Heat Exchanger Heat Transfer Coefficient):

The overall heat transfer coefficient for the RHR heat exchangers will be recalculated using the 90°F service water temperature. The RHR heat exchanger efficiency test will be revised prior to its next normally scheduled usage. In the interim, a hold has been placed on the procedure to ensure this concern is properly addressed. All related procedures and documents will be updated. A review of the past testing demonstrated that the system far exceeded the required design value of heat transfer coefficient for both RHR heat exchangers and does not represent an operability issue.

Unresolved Issue 263/92010-03 (System Flow Balancing):

Measurement of ESW flow to each of the Reactor Building loads will be performed during the 1993 refueling outage to provide additional assurance that previously completed system design verification activities and current preventive maintenance practices ensure the system is capable of performing its intended function.

Inspection Followup Item 263/92010-04 (IST Program Implementation):

The third ten-year IST program was not implemented primarily due to our uncertainty over the acceptability of implementing the program prior to receiving a NRC Safety Evaluation Report approving the associated third ten-year interval relief requests. We also believed it would be acceptable to continue following our second ten-year interval program until such time as the third ten-year interval program was approved. It was not until this question was raised by SWSOPI Inspection Team that we learned that we should have implemented the new program, with the exception of relief requests not previously approved, by the May 31, 1992 date.

We have just received an advance copy of the NRC Safety Evaluation Report dated September 24, 1992, which provides NRC comments regarding our third ten-year Inservice Testing Program. In that report, several of our relief requests were denied. We are currently assessing the NRC and Brookhaven National Laboratory comments contained in the report in order to determine what changes to our program and/or our relief requests are required. Numerous procedure revisions will be necessary before we can fully implement the new program. Based on the amount of work remaining, we intend to meet the following implementation schedule:

1. The Third Ten-year Interval IST program, with the exception of the relief requests denied in the September 24, 1992 NRC Safety Evaluation report, will be fully implemented prior to the 1993 refueling outage. The refueling outage is currently scheduled to begin on January 27, 1993.
2. With respect to the relief requests that have been denied, we will complete our assessment of your questions and comments and either submit revised relief requests or perform the testing in compliance with the applicable ASME Code, Section XI requirements and Generic Letter 89-04 guidance. Where relief was withheld pending additional information or where revised relief requests are needed, it is our intention to submit the necessary information and/or revised relief requests promptly to ensure that our program can be fully reviewed and approved prior to the 1993 refueling outage.

Although not mentioned in the Inspection Report, a related matter we wish to address involves the outstanding NRC comments concerning our second ten-year interval program. These comments were received very near the end of the program period, and it was suggested by the NRC that, in lieu of revising the second ten-year program (which would soon expire anyway), we address the comments in our third ten-year program. However, we did not receive the comments in time to act on the suggestion, since the third ten-year program was submitted before the comments were received. We will address the outstanding second ten-year program comments, as well as comments concerning Revision 0 of our third ten-year program, when we prepare Revision 1 to the third ten-year program.