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SONGS/SCE/EIX
02/01/2010 03:49 PM

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Subject: Hot Functional Testing of RSGs

(b)(7)(C) I've talked to the personnel running our test program. I've interpreted the term "Hot Functional Testing" to mean any performance related testing but not NDE (PT, MT, In-service Leak Testing, and the like as this is Code governed). Performance related testing includes hot gap testing, moisture carryover testing, blowdown capacity testing, RCS flow performance, and heat transfer performance. With the exception of hot gap testing, the test engineer indicates that the test procedures are still Revision 0 and haven't been changed from original issue. Hot gap testing was recently changed to make two major changes. In one change constituting four steps, gaps are measured at four different RCS temperatures. In two of these steps the temperatures were changed to align with natural hold points (i.e., 365 F became 350 F and 455 F to 485 F became 450 F to 500 F). In addition the soak temperature at one point was changed from between 335 F and 365 F to 320 F to 350 F. These have no change on test outcome and make it easier for Operations by not having to have multiple stopping point so close to each other. The last change deleted a six hour soak time at the 450 F to 500 F intermediate measurement point. During this period there is an action statement related to the steam driven AFW pump. It wasn't prudent (or necessary) to hold the startup at this point for a soak while in an action statement. Final measurements on gaps are made at NOP/NOT (b)(7)(C)

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