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SUBJECT: Forwards Rev 9 to "ASME Code Section XI Inservice Insp & Testing Program."

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December 30, 1988

10 CFR Part 50  
Section 50.55(g)  
TAC 46510

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

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

Revision No. 9 to the ASME Code Section XI  
Inspection and Testing Program

Attached you will find a copy of Revision No. 9 to the Monticello ASME Code Section XI Inservice Inspection and Testing Program Manual. This is a complete reprinting and revision of our Inservice Inspection and Testing program submitted to the Commission on March 27, 1981 covering the second ten-year interval of operation of the Monticello plant. We committed to review the Inservice Testing program and to make improvements as needed in response to the Safety System Functional Inspection performed by the NRC at the Monticello Nuclear Generating Plant.

NRC Staff review and approval is being requested for several revised and new Request for Reliefs.

The basis for changes to the Program, including Requests for Relief, are described in Attachment 2 to this letter.

The revised and new Requests for Relief are being submitted for NRC Staff review and approval in accordance with the provisions of 10 CFR Part 50, Section 50.55(g). Attached is a check in the amount of \$150.00 as required by 10 CFR Part 170 for the application fee.

Please contact us if you have any questions related to this revision.

David Musolf  
Manager - Nuclear Support Services

DMM/MMV

- c: Regional Administrator - III, NRC
- NRR Project Manager, NRC
- Resident Inspector, NRC
- State of Minnesota (A Justin)
- Hartford Insurance (S Tack)
- G Charnoff - w/o attachments

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- Attachments: 1) ASME Code Section XI Inservice Inspection and Testing Program
- 2) Changes to the ISI/IST Program dated December 30, 1988

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PDR ADOCK 05000263  
PDC

Instructions for Entering

1. File Cover Letter Separately.
2. The ISI/IST Program Manual has been reprinted in its entirety. Remove and discard ISI/IST Program Manual and insert the attached pages.

Attachment 2

Changes to the ISI and IST Program  
dated December 30, 1988

This revision is the result of a review of the Monticello Inservice Testing Program as committed to in our response to Safety System Functional Inspection Report No. 263/87005 dated October 13, 1987.

The Monticello Nuclear Generating Plant's ASME Code Section XI Inservice Inspection and Testing Program Manual has been rearranged into two parts, entitled "Inservice Inspection Program" and "Inservice Testing Program". The Inservice Testing Program consists of a section covering pressure testing and a section covering pump and valve testing. Each section contains requests for relief applicable to the respective program. Simplified system classification drawings have been updated and retained as part of the Inservice Inspection Program. The Inservice Testing Program has been rewritten in its entirety.

Exhibit A is a listing of revised and deleted pump and valve relief requests. Relief Request Numbers 15, 16, 18, 23, 24, 41, 42 and 51 have been moved to Section 1, Inservice Inspection Program. Relief Request Numbers 30, 31 and 49 are located in Section 2, Pressure Testing Program. Relief Request Numbers PR-2, PR-4, PR-5, SC-1, NB-1, NB-2, CS-1, HPCI-1, RCIC-1, RWCU-1, IA-2, IA-3, IA-4, and GR-2 have been added to Section 3 and replace earlier pump and valve testing program relief requests.

Exhibit B is a listing of valves deleted from the Inservice Testing Program and the basis for deletion. Exhibit C is a listing of valves added to the Inservice Inspection Program. RHR Hx 11, RHR Hx 12, and TIP 3 valves have been redesignated RV-4281, RV-4282, and AI-226-1, respectively.

As a result of the Inservice Testing Program review, changes have been made to previous commitments made in our August 12, 1982 letter to the Director, Nuclear Reactor Regulation, entitled "Supplemental Information Concerning Inservice Testing Program". Exhibit D is a listing of changes to those commitments.

## ATTACHMENT 2

## Exhibit A

LISTING OF PUMP AND VALVE RELIEF REQUESTS DELETED

Listed below are the relief requests for the Monticello Section XI pump and valve testing program that have been deleted. In most cases the deleted relief request has been incorporated into a new relief request or the appropriate section of the test program. Any differences between the deleted relief request and the new relief request or description in test program will be noted in the Remarks column.

<u>Deleted RR#</u>	<u>New RR#</u>	<u>Remarks</u>
1	PR-1	
2	Section 3.2.1	
3	Section 3.2.1	Vibration acceptance criteria will be based on the ASME OM-6 standard for pump inservice testing.
5	None	Valves AO-2-2-21A/B have been deleted.
6	RBCW-1	Modification to allow leak rate testing has been completed.
8	FW-2	
9	CRD-1	
10	Section 3.3.9	Valves HO-7 and RCIC-7 have been deleted.
13	SLC-1	
26	IA-1	
27	None	Flow instrumentation has been installed for the Emergency Service Water pumps. Relief request is no longer necessary.
28	Section 3.3.9	Stroke time acceptance criteria will be based on the ASME OM-10 standard for valve inservice testing.
39	Section 3.3.11	Excess flow check valves will be tested per Monticello Technical Specifications.
40	Section 3.3.11	Modification to allow testing of X-28F has been completed. Testing will be performed per Monticello Technical Specifications.
44	Section 3.5	
45	PR-3	
47	None	See Section 3.2.2 for discussion of pump testing ranges.
50	GR-3	
	Section 3.3.2	
52	CRD-3	
53	None	
54	REC-1	

## ATTACHMENT 2

## Exhibit A

<u>Deleted RR#</u>	<u>New RR#</u>	<u>Remarks</u>
55	CRD-2	Testing frequency changed from cold shutdown to refuel.
56	FP-1	
57	ESW-3	Modification to allow testing has been completed. Valves will be tested quarterly.
58	HPCI-2/RCIC-2	
59	None	Flow instrumentation has been installed that will allow valves to be tested.
60	RHR-1	
61	ESW-1	Modification to allow testing has been completed. Valves will be tested quarterly.
62	FW-1	
	Section 3.3.12	
63	HPCI-4/RCIC-4	
64	HPCI-3/RCIC-3	
65	HPCI-2/RCIC-2	
66	RHR-1	

SECTION XI PROGRAM UPDATE  
LIST OF DELETED VALVES

Valve No.	P&ID	Description	Justification
DM-58	M-108	Demin Water to Drywell	Due to modification DM-58 is no longer a containment boundary valve. Valve is normally open and only used for leakrate testing. Exempt per IWV-1200.
CV-2369	M-115	Rx Flange Leaktest	Valve is for operating convenience and does not perform any safety function. Exempt per IWV-1200.
CV-2370	M-115	Rx Flange Leaktest	Valve is for operating convenience and does not perform any safety function. Exempt per IWV-1200.
CV-2371	M-115	Rx Head Vent	Valve is for operating convenience and does not perform any safety function. Exempt per IWV-1200.
CV-2372	M-115	Rx Head Vent	Valve is for operating convenience and does not perform any safety function. Exempt per IWV-1200.
MO-2-43A	M-117-1	A Recirc Pump Suction	Valve used to isolate pump for maintenance or operating convenience. Exempt per IWV-1200.
MO-2-43B	M-117-1	B Recirc Pump Suction	Valve used to isolate pump for maintenance or operating convenience. Exempt per IWV-1200.
AO-2-2-21A	M-117-2	A Recirc Seal Block	Valve is located on Recirc pump seal leakoff line downstream of breakdown coil. Flow is limited by breakdown coil to less than 2 gpm. Valve is for operating convenience and is exempt per IWV-1200.
AO-2-2-21B	M-117-2	B Recirc Seal Block	Valve is located on Recirc pump seal leakoff line downstream of breakdown coil. Flow is limited by breakdown coil to less than 2 gpm. Valve is for operating convenience and is exempt per IWV-1200.

Valve No.	P&ID	Description	Justification
RV-1991	M-120	12 RHR Pump Suction RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
RV-1993	M-120	14 RHR Pump Suction RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
RV-2005	M-120	12 RHR Loop Disch RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
MO-4086	M-121	RHR Intertie	Valve performs no safety-related function and is used for operating convenience only. Exempt per IWV-1200.
RV-1990	M-121	11 RHR Pump Suction RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
RV-1992	M-121	13 RHR Pump Suction RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
RV-2004	M-121	11 RHR Loop Disch RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
RV-2025	M-121	Head Spray Line RV	Thermal relief valve, see Section 3.3.3 of IST program for justification.
HO-7	M-123	HPCI Turbine Stop Valve	Valve is considered a piece part of the HPCI turbine. Verification of proper operation is demonstrated by correct operation of the turbine.
HO-8	M-123	HPCI Turb Control Valve	Valve is used for system control and is exempt per IWV-1200.
PCV-3492	M-123	HPCI Cooling Wtr PCV	Valve is used for system control and is exempt per IWV-1200.
HO *	M-125	RCIC Turb Control Valve	Valve is used for system control and is exempt per IWV-1200.



ATTACHMENT 2 - EXHIBIT B  
SECTION XI PROGRAM UPDATE  
LIST OF DELETED VALVES

Valve No.	P&ID	Description	Justification
RCIC-7	M-125	RCIC Turb Trip/Throttle	Valve has been re-designated MO-2080. Valve is considered a piece part of the RCIC turbine. Proper operation is verified by correct operation of the turbine.
PCV-2092	M-125	RCIC Cooling Wtr PCV	Valve is used for system control and is exempt per IWV-1200.
MO-2110	M-126	RCIC Test Return	This valve is used for flow control only, isolation is provided by MO-3502. Exempt per IWV-1200.
AS-39	M-131 sh 4	Air Supply to Drywell	Due to modification AS-39 is no longer a containment boundary valve. Valve is normally open and only used for leakrate testing. Exempt per IWV-1200.
PCV-3004	M-811	11 RHRSW Clg Wtr PCV	Valve is used for system control and is exempt per IWV-1200.
PCV-3005	M-811	12 RHRSW Clg Wtr PCV	Valve is used for system control and is exempt per IWV-1200.
FCV-7682	NF-54817	OG Steam Supply Isol	Valve performs no safety related function and is considered an operating convenience valve. Exempt per IWV-1200.
X-28B,C,D	M-116	Excess Flow Checks	Modifications have spared out these instrument penetrations.
X-29B,C,D	M-116	Excess Flow Checks	Modifications have spared out these instrument penetrations.

## ATTACHMENT 2

## EXHIBIT C

## List of Valves Added to Inservice Testing Program

<u>Valve</u>	<u>P&amp;ID</u>	<u>System</u>
DM-151	M-108	Condensate & Demineralized Water Storage
DM-152	M-108	Condensate & Demineralized Water Storage
MO-4229	M-111	Reactor Building Cooling Water
MO-4230	M-111	Reactor Building Cooling Water
CST-88	M-114-1	Service Condensate - Radwaste Building
CST-90	M-114-1	Service Condensate - Radwaste Building
CST-92	M-114-1	Service Condensate - Radwaste Building
CST-94	M-114-1	Service Condensate - Radwaste Building
CST-96	M-114-1	Service Condensate - Radwaste Building
CST-98	M-114-1	Service Condensate - Radwaste Building
RV-3242A	M-115-1	Reactor Pressure Relief
RV-3243A	M-115-1	Reactor Pressure Relief
RV-3244A	M-115-1	Reactor Pressure Relief
RV-3245A	M-115-1	Reactor Pressure Relief
RV-7440A	M-115-1	Reactor Pressure Relief
RV-7441A	M-115-1	Reactor Pressure Relief
RV-7467A	M-115-1	Reactor Pressure Relief
RV-7468A	M-115-1	Reactor Pressure Relief
MO-1987	M-120	Residual Heat Removal - Train B
MO-2003	M-120	Residual Heat Removal - Train B
MO-1986	M-121	Residual Heat Removal - Train A
MO-2002	M-121	Residual Heat Removal - Train A
CST-103-1	M-122	Core Spray
CST-104-1	M-122	Core Spray
CV-2046A	M-123	HPCI - Steam Side
CV-2394A	M-123	HPCI - Steam Side
CV-2082A	M-125	RCIC - Steam Side
CV-2848	M-125	RCIC - Steam Side
SV-4283	M-125	RCIC - Steam Side
MO-3502	M-126	RCIC - Water Side
RC-6-1	M-128	Reactor Water Cleanup
RC-6-2	M-128	Reactor Water Cleanup
PAS-58-1	NF-96042	Post Accident Sampling
PAS-58-2	NF-96042	Post Accident Sampling
AS-78	M-131 Sh4	Service Air
AS-79	M-131 Sh4	Service Air
AI-596	M-131 Sh10	Alternate SRV Nitrogen Supply
AI-597	M-131 Sh10	Alternate SRV Nitrogen Supply
AI-598	M-131 Sh10	Alternate SRV Nitrogen Supply
AI-599	M-131 Sh10	Alternate SRV Nitrogen Supply
SV-4234	M-131 Sh10	Alternate SRV Nitrogen Supply
SV-4235	M-131 Sh10	Alternate SRV Nitrogen Supply
AI-13-1	M-131 Sh12	Instrument Air
AI-13-2	M-131 Sh12	Instrument Air
AI-13-3	M-131 Sh12	Instrument Air

## ATTACHMENT 2

## EXHIBIT C

## List of Valves Added to Inservice Testing Program

<u>Valve</u>	<u>P&amp;ID</u>	<u>System</u>
AI-13-4	M-131 Sh12	Instrument Air
AI-13-5	M-131 Sh12	Instrument Air
AI-13-6	M-131 Sh12	Instrument Air
AI-13-7	M-131 Sh12	Instrument Air
AI-13-8	M-131 Sh12	Instrument Air
AI-571	M-131 Sh12	Instrument Air
FO-2	M-133	Diesel Oil
FO-5	M-133	Diesel Oil
FO-43	M-133	Diesel Oil
FO-44	M-133	Diesel Oil
GSA-32-1	M-133	Diesel Oil
GSA-32-2	M-133	Diesel Oil
GSA-32-3	M-133	Diesel Oil
GSA-32-4	M-133	Diesel Oil
RV-1523	M-133	Diesel Oil
RV-3216	M-133	Diesel Oil
RV-3217	M-133	Diesel Oil
RV-3218	M-133	Diesel Oil
RV-3219	M-133	Diesel Oil
RV-3220	M-133	Diesel Oil
RV-3221	M-133	Diesel Oil
RV-3224	M-133	Diesel Oil
RV-3225	M-133	Diesel Oil
RV-3226	M-133	Diesel Oil
RV-3227	M-133	Diesel Oil
RV-3228	M-133	Diesel Oil
RV-3229	M-133	Diesel Oil
AO-2382A	M-143	Primary Containment & Atmospheric Control
AO-2382B	M-143	Primary Containment & Atmospheric Control
AO-2382C	M-143	Primary Containment & Atmospheric Control
AO-2382E	M-143	Primary Containment & Atmospheric Control
AO-2382F	M-143	Primary Containment & Atmospheric Control
AO-2382G	M-143	Primary Containment & Atmospheric Control
AO-2382H	M-143	Primary Containment & Atmospheric Control
AO-2382K	M-143	Primary Containment & Atmospheric Control
SW-22-1	M-811	RHRWS
SW-22-2	M-811	RHRWS
AV-4024	M-811	ESW
AV-4026	M-811	ESW
SW-15	M-811	ESW
SW-17	M-811	ESW
ESW-13	M-811	ESW
ESW-14	M-811	ESW
ESW-15	M-811	ESW
ESW-16	M-811	ESW

ATTACHMENT 2

EXHIBIT C

List of Valves Added to Inservice Testing Program

<u>Valve</u>	<u>P&amp;ID</u>	<u>System</u>
ESW-17	M-811	ESW
ESW-18	M-811	ESW
ESW-23	M-811	ESW
ESW-24	M-811	ESW
X-30B	M-115-1	Excess Flow Check Valves
X-30C	M-115-1	Excess Flow Check Valves
X-30E	M-115-1	Excess Flow Check Valves
X-30F	M-115-1	Excess Flow Check Valves
X-34C	M-115-1	Excess Flow Check Valves
X-34D	M-115-1	Excess Flow Check Valves
X-34E	M-115-1	Excess Flow Check Valves
X-34F	M-115-1	Excess Flow Check Valves
X-53A	M-116	Excess Flow Check Valves
X-53B	M-116	Excess Flow Check Valves
X-54A	M-116	Excess Flow Check Valves
X-54B	M-116	Excess Flow Check Valves

## EXHIBIT D

## CHANGES TO PREVIOUS SECTION XI IST COMMITMENTS

QUESTIONS AND RESOLUTIONS FROM THE OCTOBER 15, 1981  
REQUEST FOR ADDITIONAL INFORMATION FOR THE MONTICELLO  
IST PROGRAM REVIEW

- Item 1 No change to previous response.
- Item 2 No change to previous response.
- Item 3 No change to previous response. These valves were previously listed in the program with the notation of "exempt per IWV-1200a". These valves have now been deleted from the program.
- Item 4 No change to previous response.
- Item 5 Valves AS-39 and DM-58 have been deleted from the program. Additional valves were added to the lines during modifications for Appendix J testing. AS-39 and DM-58 are now normally open and only closed for leak rate testing.
- Item 6.a Modifications to allow testing of SW-101, 102, 103 and 104 have been completed. Testing has been performed each refueling outage on these valves. Testing frequency will be changed to quarterly.
- Item 6.b Flow instrumentation has been added to the ESW system. Therefore full flow can be verified through valves ESW-4-1 and ESW-4-2. Valves will be exercised quarterly instead of the present 5 year disassembly/exercise schedule.
- Item 6.c No change to previous response.
- Item 6.d No change to previous response.
- Item 6.e No change to previous response.
- Item 6.f No change to previous response.
- Item 6.g No change to previous response.
- Item 6.h HPCI-60 is exercised quarterly during the HPCI surveillance.
- Item 6.i No change to previous response.
- Item 6.j Modification to allow testing has been completed.

## EXHIBIT D

- Item 6.k Modification to allow testing has been completed.
- Item 6.l Modifications to allow testing of the valves has been completed. Testing has been performed each refueling outage on these valves. Testing frequency will be changed to quarterly.
- Item 6.m PC-20-1 and PC-20-2 have no open safety function and are not exercised open quarterly. Disassembly/exercise is performed as stated to verify valve closure.
- Item 7.a No change to previous response.
- Item 7.b No change to previous response.
- Item 8 The stroke time acceptance criteria will be changed to incorporate the guidelines of ASME OM-10 standard for inservice testing of valves.
- Item 9 No change to previous response.
- Additional Item No change to previous response.

RESPONSES TO QUESTIONS IN LETTER DATED APRIL 14, 1982

- Item 1 No change to previous response.
- Item 2 Valves with fail-safe actuators are tested per IWV-3415 except for those valves where the normal stroking of the valve removes the motive power from the valve. For these valves no additional fail safe testing will be performed.
- Item 3 The requirements of IWV-3300 for position indication verification will comply with for inaccessible and accessible valves.
- Item 4 No change to previous response.
- Item 5 No change to previous response.
- Item 6 No change to previous response.
- Item 7 The modification for testing X-28F has been completed. Testing is performed as required by Tech Specs.
- Item 8 These valves have been deleted. The flow out of these valves is limited to less than 2 gpm by the pressure breakdown coils upstream. These valves do not perform a safety-related function and are for operating convenience.

## EXHIBIT D

Item 9 No change to previous response.

ADDITIONAL CHANGES TO IST PROGRAM

Item 1 No change to previous response.

Item 2 No change to previous response.

Item 3 The acceptable/alert/required action ranges for pump vibration will incorporate the guidelines of the ASME OM-6 standard for inservice testing of pumps.