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> SUBJECT: Forwards response to NRC question re classification of instrumentation & control for containment isolation valves FUV-37 & FCV-28,

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J. O. SCHUYLER VICE PRESIDENT NUCLEAR FOWER GENERATION

July 27, 1983

Mr. George Knighton, Chief Licensing Branch No. 3 Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

> Re: Docket No. 50-275, OL-DPR-76 Diablo Canyon Unit 1 Information on EOI-8018

Dear Mr. Knighton:

The attached information is in response to the NRC Staff's question concerning classification of instrumentation and control for containment isolation valves FCV-37 and FCV-38, as described in EOI-8018.

Sincerely,

1.0 Schungles

Attachment

cc: Service List

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ATTACHMENT TO G. KNIGHION LETTER JULY 27, 1983

In the review of EOI-8018, Class I Qualification of FCV-37 and FCV-38, the NRC Staff requested justification for the use of Design Class II instrumentation and controls for valves FCV-37 and FCV-38 when considering the containment isolation function.

The operators for values FCV-37 and FCV-38 were procured and installed as Class IE. They use Limitorque SMB actuators that have been qualified for harsh environment outside containment.

These values are designated as containment isolation values; however the safety function of the system in which they are located, as defined in BTP ICSB 13, "Design Criteria for Auxiliary Feedwater System," is for the values to remain open. In this non-isolated position, steam can then be provided to the auxiliary feedwater turbine.

While procured and installed as Design Class I, these valves have been designated instrument Class II because their operation is not required for the Auxiliary Feedwater System to perform its safety function. They are shown as being normally open in the FSAR. As stated in the FSAR, these valves remain open after a containment isolation signal but are manually operable from the control room.

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• For the case of a postulated steam generator tube rupture, whether the operator closes values FCV-37 and FCV-38 is not significant. The dose contribution through the value pathway is insignificant, since most of the steam is assumed in the FSAR analysis to be dumped directly into the atmosphere through the main steam safety and relief values. This analysis is documented in Section 15.4.3 of the Diablo Canyon FSAR.

-2-

If required, the pathway through the AFW turbine can be isolated manually from the control room either by closing FCV-37 and FCV-38, or by closing FCV-95 which is designed, procured, installed and designated as an Instrument Class IA valve. In fact, considering the time frame available and the nonaccident dose rate levels, these valves can be manually closed at the valve.

PGandE's position is that while the valve operators have been procured and installed to the same criteria as instrument Class IA valves, they have been properly classified as instrument Class II because of their system function. *ي* د

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