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77 BEALE STREET, 31ST FLOOR . SAN FRANCISCO, CALIFORNIA 94106 . (415) 781-4211

PACIFIC GAS AND ELECTRIC COMPANY

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December 6, 1978

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VICE PRESIDENT AND GENERAL COUNSEL MALCOLM H. FURBUSH Associate general counsel

JOHN C. MORRISSEY

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CHARLES T, VAN DEUSEN PHILIP A, CRANE, JR. HENRY J, LAPLANTE RICHARD A, CLARKE JOHN B, GIBSON ARTHUR L, HILLMAN, JR. ROBERT OHLBACH CHARLES W. THISSELL ASSISTINT CONVICT.

> Mr. John F. Stolz, Chief Light Water Reactors Branch No. 1 Division of Project Management U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> > Re: Docket No. 50-275-OL Docket No. 50-323-OL Diablo Canyon Units 1 & 2

Dear Mr. Stolz:

• • I

Enclosed are eight requests for exemption from ASME Code Section XI pump and valve testing requirements. Requests one through four and five through eight are respective continuations of attachments seven and nine to our letter, dated October 10, 1977, containing our plan for complying with Section 50.55a(g) of 10 CFR 50.

These additional requests for exemption make our pump and valve testing program consistent with programs approved by the Staff for other applicants.

Very truly yours,

Philips C Grane,

Enclosures

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COMPONENT	- FUNCTION	ASI CODE CLASS	VALVE CATEGORY
Auxiliary Feedwater Pump No. 11 Discharge Check	Open during aux feed pump discharge to steam generator	3	BC
Auxiliary Feedwater Pump No. 12 Discharge Check	Open during aux feed pump discharge to steam generator	3	BC
Auxiliary Feedwater Pump No. 13 Discharge Check	Open during aux feed pump discharge to steam generator	3	BC
Auxiliary Feedwater Pump No. 11 to S/G Check (8)	Open during aux feed pump discharge to steam generator	3	BC
Auxiliary Feedwater Pump No. 12 to S/G Check (2)	Open during aux feed pump discharge to steam generator	3	BC
Auxiliary Feedwater Pump No. 13 to S/G Check (2)	Open during aux feed pump discharge to steam generator	3	BC
Centrifugal Charging Pumps Discharge Check 8478A, B	Open during pump discharge to charging header or BIT	2	, BC
Residual Heat Removal to RCS Cold Leg Check 8818A,B,C,D	Open during safety injection and normal cooldown by RHR	1	BC
Boron Injection Tank Outlet Check 8820	Open during safety injection	1	BC
Safety Injection Pump Discharge Checks 8922A, B	Open during safety injection	2	BC
Charging Pumps Suction Check 8924	Open during safety injection	2	BC
Safety Injection RCS Cold Leg Check 8948A,B,C,D	Open during safety injection	1	BC
Accumulator Discharge Checks 8956A,B,C,D	Open during accumulator discharge	1	. BC
Safety Injection to Hot Legs Check 8949A,B,C,D	Open during ECCS hot leg recirculation	1	BC
Refueling Water TK to Safety Inj PP Check 8977	Open during safety injection	2	BC ,
Refueling Water Tk to Residual Heat Removal Pumps Check 8981	Open during safety injection	2	BC
Residual Heat Removal PP Disch Checks 8730A.B	Open during pump operation	2	BC
Residual Heat Removal to RCS Hot Legs 8740A, B	Open during ECCS hot leg recirculation	ר	BC
Spray Additive to Eductors Checks 8998A, B	Open during containment spray caustic addition	2	BC
Component Cooling Water Pumps' Discharge Checks (6 valves)	Open during pump operation	3	BC ·
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REQUEST FOR RELIEF 1 (Cont'd)



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COMPONENT	FUNCTION	CUDE. CLASS	CATEGORY
Makeup Water Pumps! Discharge Checks (2 valves)	Open during pump operation	3	BC
Auxiliary Saltwater Pumps' Dis- charge Checks (2 valves)	Open during pump operation	3	BC

Code Requirement

IWV-3520(b)(2) For swing or tilting disc type valves, if the test is made by use of fluid flow through the valve, the pressure differential for equivalent flow shall be no greater than that observed during the preoperational test. Discs cannot be mechanically exercised.

Basis

В

Instrumentation is not installed in systems to permit measurement of differential pressure across these valves.

Testing to be Performed in Lieu of Code Requirements

Flow through the valves will be verified by observation of system parameters.

Schedule for Implementation

Prior to power escalation on each unit.

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		CODE	VALVE
COMPONENT	FUNCTION	LLASS	LATEGORT
Liquid Holdup Tanks Relief Valves RV-110, 112, 113	Provide holdup tank overpressure protection	3	C
Liquid Holdup Tanks Vacuum Relief Valves RV-140, 141, 142	Provide holdup tank vacuum protection	3	С
Boron Injection Tank Relief Valve 8852	Provide BIT overpressure protection	2	С
Residual Heat Removal Suction Piping Relief 8707	Provide RHR system overpressure protection	2 '	С
Waste Gas Vent Header Relief Valve RV-246	Provide vent header overpressure protection	3	C
Waste Gas Decay Tank Relief Valves RV-247, 248, 249	Provide tank overpressure protection	3	C
Waste Gas Moisture Separators' Relief Valves RV-228, 229	Provide compressor discharge over- pressure protection	3	C

Code Requirement

IWV-3510(a) Requires testing each valve at 5-year intervals.

<u>Basis</u>

- Liquid Holdup Tanks and Waste Gas Relief Valves Operational problems involved in testing these relief valves include (a) moving waste gas to permit valve isolation, (b) purging systems increases radwaste volume, (c) potential exists for hydrogen explosions and release of airborne radioactive waste.
- Residual Heat Removal Suction relief valve 8707 The RHR system must either be in operation or be operable to remove decay heat, provide reactor coolant mixing, or to function as part of the ECCS with fuel in the core. Testing this valve requires removing both RHR trains from service.
- 3. Boron Injection Tank Relief Valve 8852 Testing this valve requires that the Boron Injection Tank discharge piping be drained and removed from service.

Testing to be Performed in Lieu of Code Requirements

Setpoints for these valves will be determined when affected portions of systems are removed from service, but no more frequently than once per 5 years.

Schedule for Implementation

When required.

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COMPONENT	FUNCTION	CODE CLASS	VALVE CATEGORY
Safety Injection to RCS Cold Legs Check Valves 8819A,B,C,D	Open during safety injection	1	BC
Boron Injection Tank Outlet Check Valve 8820	Open during safety injection	ר	BC
Boron Injection Tank Outlet Check Valves 8900A,B,C,D	Open during safety injection	1	BC
Safety Injection to RCS Hot Legs Check Valves 8905A,B,C,D	Open during ECCS Hot Leg Recirculation	1	BĊ
Safety Injection Pumps Discharge Check Valves 8922A, B	Open during safety injection	2	BC
Safety Injection to RCS Cold Legs Check 8948A,B,C,D	Open during safety injection 걓	1	BC
Accumulator Discharge Check Valves 8956A,B,C,D	Open during accumulator discharge	1	BC
Safety Injection to Hot Legs Discharge Check Valves 8949A,B,C,D	Open during ECCS hot leg recirculation	1	BC
Refueling Water Storage Tank to Residual Heat Removal Pumps Check 8981	Open during safety injection	1	BC

Code Requirement.

IWV-3520(b) If exercising is not practical during operation, valves must be exercised during cold shutdown.

Basis.

These valves can be exercised only by initiating flow through the systems. In cold shutdown, the probability of pressure spiking the reactor coolant system is greatly increased in performing this exercising.

Testing to be Performed in Lieu of Code Requirements

This exercising will be performed during refueling outages when the head is removed from the reactor vessel.

Schedule for Implementation

Prior to power escalation in each unit.

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COMPONENT	FUNCTION	CODE CLASS	VALVE CATEGORY
Residual Heat Removal Discharge to Charging Pumps Suction Valve 8804A	Open during ECCS cold leg recirculation	2	В
Residual Heat Removal Discharge to Safety Injection Pumps Suction Valve 8804B	Open during ECCS recirculation	2	В
Residual Heat Removal Pumps Suction Valve from Containment Sump 8982A and B	Open during ECCS recirculation	2	В
Residual Heat Removal Discharge to Spray System Valves 9003A and B	Open during ECCS recirculation	2	В
Safety Injection Pump Recircula- tion Valves to RWST - 8974A and B	Open during ECCS recirculation	2	В

Code Requirement

IWV-3410(b)(1) - Requires exercising valves either during operation or cold shutdown.

<u>Basis</u>

Exercising these valves requires system configurations which deviate considerably from those normally established. A loss of residual heat removal capability occurs during exercising of many of the above listed valves. The risks involved in this exercising at this frequency cannot be justified.

Testing to be Performed in Lieu of Code Requirement

These valves will be exercised during refueling outages only.

Schedule for Implementation

Prior to power operation.

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Code Requirement

IWC 5000 hydrostatic test

<u>Basis</u>

The piping is not isolable from Class 1 piping. Class 1 piping is not tested to same pressure.

Testing to be Performed in Lieu of Code Requirements

The piping will be tested to Class 1 requirements

Schedule for Implementation

When required.

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Component

1. Diesel fuel storage tanks and piping to diesel generator day tanks.

2. Embedded auxiliary saltwater piping.

Code Requirement

IWD-2410 - Visual examination, pressure test

Basis

Tanks and piping are underground and not accessible for inspection and/or testing. Routine quarterly analyses of fuel oil verifies moisture is not leaking into tanks.

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Testing to be Performed in Lieu of Code Requirements

None

Schedule for Implementation

None



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COMPONENT	FUNCTION	ASME CODE CLASS
All Class 1, 2, and 3 Components	Pressure retaining	1,2,3

Code Requirement

IWA-5210(a) - 4 hour test

Basis

This requirement is not practical nor meaningful when performing pressure tests or areas that are exposed for visual examination. The four hour requirement is based on detection of leakage from insulated areas. Where areas are exposed for visual examination, a shorter time period is justified.

Testing to be Performed in Lieu of Code Requirements

Where areas of examination are not exposed, the test pressure and temperature will be maintained for a minimum of four hours as required by IWA-5210(a).

Where areas to be examined are exposed for visual examination, the test pressure and temperature will be maintained for a minimum of ten minutes as established by IWA-5210(a)-Winter 1975 Addenda.

Schedule for Implementation

Prior to power operation.

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COMPONENT	FUNCTION	CODE CLASS
All Class 2 Components	Pressure retaining	. 2

Code Requirement

The system pressure tests will not be distributed as required by IWC-2412.

Basis

Scheduling system pressure tests in this manner is not practical as mechanisms are not available for isolation of the piping systems at the various boundaries. Redundant pressure tests will be performed which is not warranted considering the operational problems (system valve lineups, leak off or over-pressure protection, radiation exposure, generation of waste, etc.) involved.

Testing to be Performed in Lieu of Code Requirements

All components will be pressure tested at or near the end of each inspection interval.

Schedule for Implementation

At or near the end of the first 10-year inspection interval.



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