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SUBJECT: Request relief from cold shutdown test frequency requirements of ASME Section XI.

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March 29, 1994

PG&E Letter DCL-94-064

U.S. Nuclear Regulatory Commission
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Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Inservice Testing Program - Relief Request for Check Valves 8820 and 8900A-D

Gentlemen:

Enclosed is a proposed relief request (relief request no. 24) applicable to valves 8820 and 8900 A,B,C,&D in the Diablo Canyon Units 1 and 2 Inservice Testing (IST) Program. PG&E is requesting relief from the cold shutdown test frequency requirements of ASME Section XI. Alternatively, PG&E intends to full-flow exercise these valves on a refueling outage frequency. In addition, valve 8820 will be partial stroke tested during cold shutdowns.

This alternative valve testing was originally approved in relief request no. 8 by the NRC in a Safety Evaluation dated December 22, 1988. However, subsequent changes to the plant design necessitated a change to the technical basis of the relief request. Therefore, new relief request no. 24 is being submitted for approval. A complete description of the relief request, including technical basis, is enclosed.

DCPP Unit 2 is currently in an unscheduled Mode 5 shutdown (cold shutdown). To support restart, PG&E requests that the relief be approved by the NRC by April 1, 1994, which is the scheduled date for DCPP Unit 2 entry into Mode 4.



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These reliefs are justified in accordance with 10 CFR 50.55a(3) because this proposed alternative testing provides an acceptable level of quality and safety, and compliance with requirements of ASME Section XI results in a hardship and unusual difficulties without a compensating increase in the level of quality and safety.

Sincerely,

Gregory M. Rueger

cc: Mary H. Miller
Kenneth E. Perkins
Sheri R. Peterson
Diablo Distribution

Enclosure

6413S/JHA/469

**ENCLOSURE**

DIABLO CANYON POWER PLANT, UNITS 1 AND 2
INSERVICE TESTING (IST) PROGRAM

REQUEST FOR RELIEF FROM ASME SECTION XI REQUIREMENTS

TESTING OF CHECK VALVES 8820 AND 8900A-D

## VALVE RELIEF REQUEST NO. 24

Valves: 8820, Charging Injection 2nd-off Check Valve
8900A, Charging Injection Loop-1 Cold Leg Check Valve
8900B, Charging Injection Loop-2 Cold Leg Check Valve
8900C, Charging Injection Loop-3 Cold Leg Check Valve
8900D, Charging Injection Loop-4 Cold Leg Check Valve

Category: C Code Class: 1

Function: These check valves open to supply safety injection flow to the reactor coolant system (RCS) cold legs from the high-head safety injection pumps (centrifugal charging pumps). In the closed position, these check valves function to prevent backflow from the RCS.

Test Reqt: IWV-3522, quarterly full-stroke exercise

Basis: Relief is required from the Code-required quarterly test frequency.

These valves cannot be full-stroke exercised during plant operation because the high RCS pressure will prevent the maximum required injection flow rate. Part-stroke exercising these valves during plant operation is not practicable because any flow through the valves would result in unnecessary thermal transients on the RCS cold leg nozzles.

These valves cannot be full-stroke exercised during cold shutdown because of insufficient RCS expansion volume to accommodate the high flow rates required to full-stroke these valves. These high flow rates could challenge the RCS low temperature overpressure (LTOP) mitigation system. To prevent challenging the LTOP system, venting of the pressurizer by removal of a safety valve would be required. Additionally, full-stroke exercising these valves cannot be performed with a bubble in the pressurizer, because the net charging rate must be minimal to prevent thermal cycling of the pressurizer.

Valves 8900A-D cannot be part-stroke exercised during cold shutdown for the same reasons that they cannot be full-stroked. In addition, the charging injection flow path is not designed for throttled operation which would be required to part-stroke all four parallel check valves.

These valves are not equipped with mechanical exercisers, position indicators, or differential pressure instrumentation.

Alternate: As an alternative to the Code-required quarterly testing, these valves will be full-stroke exercised on a refueling outage frequency. In addition, valve 8820 will be part-stroked during cold shutdowns via a small test line. This alternate testing meets the requirements of Part 10 of ASME/ANSI Operation and Maintenance Code.