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ZWOLINSKI, J. A. BWR Project Directorate 1

SUBJECT: Provides addl info re 840321 application to amend Tech Specs 3.1.5, 4.1.5, 3.2.9 & 4.2.9. Solenoid actuated pressure relief. Valve testing at or near operating pressure & temp appropriate based on listed reasons.

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December 31, 1985
NMP1 L0007

Director of Nuclear Reactor Regulation
Attention: Mr. John A. Zwolinski, Project Director
BWR Project Directorate Number 1
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Zwolinski:

Our letter of March 21, 1984 proposed changes to technical specification sections 3.1.5, 4.1.5, 3.2.9 and 4.2.9. The following information is provided to supplement and clarify that letter with respect to testing of the solenoid actuated pressure relief valves.

Testing of these valves at or near operating temperature and pressure provides the best assurance that these valves will operate satisfactorily if called upon to actuate. Reasons for this are:

1. Valve operation during automatic depressurization system actuation would be expected to occur during normal power operation. Therefore, valve operation to depressurize the system would likely start at or near normal operating pressure and temperature.

2. Valve operation in response to overpressure would occur slightly above reactor operating pressure.

3. The thermal conditions and pressure loads on the valves are more severe at rated pressure and temperature conditions. In particular, concerns regarding effects of differential thermal expansion of close clearance parts would be greater at reactor operating temperature than at lower temperatures.

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4. While the valves depend on system pressure to actuate the main valve, a system pressure of approximately 250 psig is adequate to open the valves. Further, actual experience with failures of relief valves to open have typically been associated with mechanical problems with the pilot valve, its solenoid actuator and the solenoid-pilot valve linkages, which are not affected by valve pressure.

5. Relief valve actuation at operating temperature and pressure during startup would be verified by flow through the relief valves as indicated by closure of the turbine bypass valves.

Based on the above, testing of the relief valves at operating temperature and pressure is deemed appropriate.

Very truly yours,

CVMangan

C. V. Mangan
Senior Vice President

MGM:ja