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MANGAN, C. V. Niagara Mohawk Power Corp.
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Forwards changes to Tech Specs & affected FSAR pages necessary for certification of Tech Specs. Expeditious resolution of items requested.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

August 21, 1986
(NMP2L 0841)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

Niagara Mohawk Power Corporation is continuing the review of the Final Draft Technical Specifications and has identified changes to the following:

1. Technical Specifications - The specific changes to the Technical Specifications and their justification (where appropriate) are provided in the enclosure.

2. Final Safety Analysis Report - Where the Technical Specification changes affect the Final Safety Analysis Report, the changes to the appropriate pages of the Final Safety Analysis Report are provided in the enclosure. In addition, changes to the Final Safety Analysis Report are also included to correct inconsistencies between the Technical Specifications and the Final Safety Analysis Report.

These changes are categorized as necessary for certification of the Technical Specifications, editorial, or for operational flexibility. The changes provided in the enclosure of this letter are in addition to our letters dated August 6, 1986, August 18, 1986, and August 21, 1986. If the previously mentioned letters contained changes on the same pages which are included in this letter, then the previous changes are also included. A list of the change to the Technical Specifications and to the Final Safety Analysis Report is included to aid your staff in the review of these changes.

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1/1

Since certification of the Technical Specifications now appears to be the critical step in the Licensing of Nine Mile Point Unit 2, we would appreciate your expeditious resolution of these items.

Very truly yours,

C. V. Mangan
Senior Vice President

WHB/ar
1998G

xc: W. A. Cook, NRC Resident Inspector
Project File (2)

UNITED STATES OF AMERICA
NULCEAR REGULATORY COMMISSION

In the Matter of Niagara Mohawk Power Corporation (Nine Mile Point Unit 2)	)))	Docket No. 50-410

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C.V. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 22nd day of August, 1986.

Christine Austin
Notary Public in and for
Onondaga County, New York

My Commission expires:

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4787687
My Commission Expires March 30, 1987

(1998G)

LIST OF TECHNICAL SPECIFICATION,
FINAL SAFETY ANALYSIS REPORT PAGES CHANGED

Page No. In This Submittal	Description	Document*	Page	Category
3	RCS Isolation Valve	TS	3/4 6-25	Certification
		FSAR	Table 6.2-56	
4			(Page 15 of 24)	
5			(Page 16 of 24)	
6			(Page 24 of 24)	
7			(Page 24a of 24)	
10	Other Items	TS	3/4 3-93	Certification
11		TS	3/4 6-27	
12		TS	3/4 6-34	

*FSAR = Final Safety Analysis Report
TS = Technical Specification

Changes to Technical Specifications and Final Safety Analysis Report in the Area of Reactor Coolant System Isolation Valve Closure Time.

Subject: Justification for the change to the Technical Specification and Final Safety Analysis Report in the area of Reactor Coolant System valve closure on containment isolation.

The requested change is enclosed. The Reactor Coolant System flow control valve hydraulic lines are each provided with two solenoid operated containment isolation valves. The measured stroke times of these valves in the field were, in most cases, unacceptably long. This sluggish operation was attributable to the high viscosity of the hydraulic fluid (FYRQUEL-EHC) and to the fact that four of these valves had to be oriented vertically downwards due to space limitations.

All of these valves have been returned to the vendor for modification. This modification involved the replacement of the actuator spring with stiffer springs and the machining of the valve internals. These modifications will shorten the closing times by increasing the available closing force and by enhancing the flow of the hydraulic fluid within the internal passages of the valves.

After the valves were modified, the vendor tested them. The test procedures assured that the valves were filled with FYRQUEL with no entrapped air. All of the valves closed within 10 seconds. The required time for valve isolation, in conformance with Bases 3/4 6.3, is therefore changed to 20 seconds.

CHANGE REQUESTED FOR CERTIFICATION.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

ISOLATION VALVE NO.	VALVE FUNCTION	VALVE GROUP	ISOLATION SIGNAL(a)	MAXIMUM CLOSING TIME (SECONDS)
2CPS*SOV132	Nitrogen to 2CPS*AOV107 Outside IV	9	B,F,Y,Z,RM	5
2CPS*SOV133	Nitrogen to 2CPS*AOV109 Outside IV	9	B,F,Y,Z,RM	5
2LMS*SOV152(i)	LMS from Drywell Inside IV	8	B,F,Z,RM	5
2LMS*SOV153(i)	LMS from Drywell Outside IV	8	B,F,Z,RM	5
2LMS*SOV156(i)	LMS from SP Inside IV	8	B,F,Z,RM	5
2LMS*SOV157(i)	LMS from SP Outside IV	8	B,F,Z,RM	5
2RCS*SOV65 A,B(1)	Hyd. Unit to RCS FCVs Outside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV66 A,B(1)	Hyd. Unit to RCS FCVs Outside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV67 A,B(1)	Hyd. Unit to RCS FCVs Outside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV68 A,B(1)	Hyd. Unit from RCS FCVs Outside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV79 A,B(1)	Hyd. Unit to RCS FCVs Inside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV80 A,B(1)	Hyd. Unit to RCS FCVs Inside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV81 A,B(1)	Hyd. Unit to RCS FCVs Inside IV's	8	B,F,Z,RM	~~5~~ 20
2RCS*SOV82 A,B(1)	Hyd. Unit from RCS FCVs Inside IV's	8	B,F,Z,RM	~~5~~ 20
2ICS*MOV121	RCIC Steam Supply Outside IV	10	K,M,H,Z,RM,BB,CC,DD	14
2ICS*MOV128(n)	RCIC Steam Supply Inside IV	10	K,M,H,~~Z~~,RM,BB,CC,DD	14
2ICS*MOV170	RCIC Warmup Valve Inside IV	10	K,M,H,~~Z~~,RM,BB,CC,DD	10
2WCS*MOV102	WCS Supply from RCS & RPV Inside IV	7	B,J,U,S,Z,RM,DD	14
2WCS*MOV112	WCS Supply from RCS & RPV Outside IV	6	B,J,U,S,Z,RM,DD	14
2ICS*MOV148	RCIC Vacuum Breaker Outside IV	11	H & F, RM	18
2NMS*SOV1 A, B, C, D, E	Traversing Incore Probe Ball Outside IV's	3	B,F,Z,RM	5
2GSN*SOV166	Nitrogen Purge to TIP Indexing Mechanism Outside IV	3	B,F,Z,RM	5

Penetration No.	System Designation	GDC or Reg. Guide	EST System	Fluid	Size (in.)	FSAR Arrangement Figure(s)	Location of valve Inside/Outside Primary Containment	Length of Pipe - Containment to Outside Isolation Valve	Type Test (1)	Potential Bypass Leakage Path	Valve Number SYMB	Valve Number GE	Valve(s) Type	Valve(s) Oper-ator	Valve(s) Actuator Energy	Valve(s) Actuator Mode Safety/Diversity	Valve(s) Position Normal (2)	Valve(s) Position Shutdown	Valve(s) Position Post-Accident	Valve(s) Position Power Failure	Isolation Signal (2,3)	Closure Time (2,4)	Power Source (2)	Notes
2-92	N$_2$ supply to actuators for 2CPS*AOV109	56	No	Air/N$_2$	1	6.2-70 Sh. 43A	Outside Inside	10'-2" -	C	Yes	2CPS*SOV133 2CPS*V51	- -	Globe Check	SOV N/A	Elec. Process	N/A N/A	Closed Closed	Closed Closed	Closed Closed	Closed Closed	B,F,T,SS,Z Reverse flow	5 N/A	Div II N/A	24
2-96	N$_2$ supply to actuators for 2CPS*AOV107	56	No	Air/N$_2$	1	6.2-70 Sh. 43B	Outside Inside	19'-4" -	C	Yes	2CPS*SOV132 2CPS*V50	- -	Globe Check	SOV N/A	Elec. Process	N/A N/A	Closed Closed	Closed Closed	Closed Closed	Closed Closed	B,F,T,SS,Z Reverse flow	5 N/A	Div II N/A	
2-98A	RHR relief valve discharge to suppression pool	56	Yes	Water	3	6.2-70 Sh. 3A	Outside	207'-6"	A	No(20)	2CSL*RV123 2CSL*RV105 2RHS*PF611 2RHS*PF110 2RHS*RV139 2RHS*PF201	E21-F031 E21-F018 E12-F088A E12-F006 E12-F030 E12-F025A	Relief Valves	N/A	N/A	N/A	N/A	N/A	N/A	N/A	None	N/A	N/A	25
2-98B	RHR relief valve discharge to suppression pool	56	Yes	Water	3	6.2-70 Sh. 3B	Outside	89'-8"	A	No(20)	2CSH*RV114 2CSH*RV113 2RHS*PF611B 2RHS*PF611C 2RHS*PF208	E22-F035 E22-F018 E12-F088B E12-F088C E12-F025B	Relief Valves	N/A	N/A	N/A	N/A	N/A	N/A	N/A	None	N/A	N/A	25
2-99A	Hydraulic unit flow recirc flow control valve HIV 17A (drain line)	56	No	Hydraulic	3/8 Sh. 39	6.2-70	Outside Inside	0'-0" 0'-0"	N/A	No(21)	2RCS*SOV691 2RCS*SOV692A	- -	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SS,Z B,F,SS,Z	10 10	Div I Div II	26
2-99B	Hydraulic unit to recirc flow control valve HIV 17A (open line)	56	No	Hydraulic	1 Sh. 39	6.2-70	Outside Inside	0'-0" 0'-0"	N/A	No(21)	2RCS*SOV671 2RCS*SOV811	- -	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SS,Z B,F,SS,Z	10 10	Div I Div II	26
2-99C	Hydraulic unit to recirc flow control valve HIV 17A (pilot line)	56	No	Hydraulic	1 Sh. 39	6.2-70	Outside Inside	0'-0" 0'-0"	N/A	No(21)	2RCS*SOV668 2RCS*SOV801	- -	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SS,Z B,F,SS,Z	10 10	Div I Div II	26

TABLE 6.2-56 (Cont)

Penetration No.	System Designation	GDC or Reg. Guide	ESF System	Fluid	Size (in.)	FSAR Arrangement Figure(s)	Location of valve Inside/ Outside Primary Containment	Length of Pipe Contained to Outside Isolation Valve	Type Test (1)	Potential Bypass Leakage Path	Valve(s) Number		Valve(s) Type	Valve(s) Operator	Valve(s) Actuator Energy	Valve(s) Body Seat Material	Valve(s) Position Normal (2)	Valve(s) Position Shutdown	Valve(s) Position Post-Accident	Valve(s) Position Power Failure	Isolation Signal (3)	Closure Time (3,4)	Power Source (5)	Notes
2-99D	Hydraulic unit to recirc flow control valve HIV 17A (closed line)	56	No	Hydraulic	1	6.2-70 Sh. 39	Outside Inside	0'-0" 0'-0"	N/A	No(21)	29CS*SOV65A 29CS*SOV79A	-	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SH,Z B,F,SH,Z	5*10 5*10	Div I Div II	26
2-100A	Hydraulic unit to recirc flow control valve HIV 17B (drain line)	56	No	Hydraulic	3/8	6.2-70 Sh. 39	Outside Inside	0'-0" 0'-0"	N/A	No(21)	29CS*SOV68A 29CS*SOV82A	-	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SH,Z B,F,SH,Z	5*10 5*10	Div I Div II	26
2-100B	Hydraulic unit to recirc flow control valve HIV 17B (open line)	56	No	Hydraulic	1	6.2-70 Sh. 39	Outside Inside	0'-0" 0'-0"	N/A	No(21)	29CS*SOV67A 29CS*SOV81A	-	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SH,Z B,F,SH,Z	5*10 5*10	Div I Div II	26
2-100C	Hydraulic unit to recirc flow control valve HIV 17B (pilot) line)	56	No	Hydraulic	1	6.2-70 Sh. 39	Outside Inside	0'-0" 0'-0"	N/A	No(21)	29CS*SOV66A 29CS*SOV80A	-	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SH,Z B,F,SH,Z	5*10 5*10	Div I Div II	26
2-100D	Hydraulic unit to recirc flow control valve HIV 17B (closed line)	56	No	Hydraulic	1	6.2-70 Sh. 39	Outside Inside	0'-0" 0'-0"	N/A	No(21)	29CS*SOV65A 29CS*SOV79A	-	Globe Globe	SOV SOV	Elec. Elec.	N/A N/A	Open Open	Closed Closed	Closed Closed	Closed Closed	B,F,SH,Z B,F,SH,Z	5*10 5*10	Div I Div II	26
	All instrument lines from reactor vessel	R.G. 1.11	No	Air/ Water	3/8	6.2-70 Sh. 41	Outside	<10'-0"	A	No(21)	RF check valves	-	RFV	N/A	Auto	N/A	Open	Open	Open	Open	Excess flow	N/A	N/A	27
	All instrument lines penetrating primary containment	R.G. 1.11	No	Air/ Water	3/8	6.2-70 Sh. 41	Outside	<10'-0"	A	No(21)	RFV	-	RFV	N/A	Auto	N/A	Open	Open	Open	Open	Excess flow	N/A	N/A	27

TABLE 6.2-56 (Cont)

Integrity of the system is, essentially, constantly monitored since the system is under a constant operating pressure of 1,800 psig. Any leakage through this system would be noticed because operation would be erratic and because of indications provided on the hydraulic control unit. In addition, in order to perform Type C tests on these lines, the system would have to be disabled and drained of hydraulic fluid. This is considered to be detrimental to the proper operation of the system since possible damage could occur in establishing the test condition or restoring the system to normal. These lines and associated isolation valves should therefore be considered to be exempt from containment testing. A specific exemption will be forwarded under separate cover. 17 17

INSERT Page 24a →

(27) Instrument lines that penetrate primary containment conform to Regulatory Guide 1.11. The lines that connect to the reactor pressure boundary include a restricting orifice inside containment, are Category I, and terminate in instruments that are Category I. The instrument lines also include manual isolation valves and excess flow check valves or equivalent. These penetrations will not be Type C tested since the integrity of the lines is continuously demonstrated during plant operations where subject to reactor operating pressure. In addition, all lines are subject to the Type A test pressure on a regular interval. Leaktight integrity is also verified with completion of functional and calibration surveillance activities as well as by visual observations during operator tours.

(28) Signal B or F cause automatic withdrawal of tip probe. When probe is withdrawn, the solenoid-operated ball valve automatically closes by mechanical action.

(29) This path does not constitute a bypass leakage path, because a closed piping system outside the primary containment provides a leakage boundary. The piping/components outside the primary containment qualify as a closed system for the following reasons:

a. The system leakage boundary leak path does not directly communicate with the environment following a loss-of-coolant accident.

The relatively slow closing time of these solenoids is due to the hydraulic fluid used in this system.

Changes to Technical Specifications

on Other Items

Subject: Changes to Technical Specifications for items required for certification

The requested changes to Technical Specifications are enclosed. These changes are requested for certification and reflect the Nine Mile Point Unit 2 design.

CHANGES REQUESTED FOR CERTIFICATION

TABLE 3.3.7.8-1 (Continued)

FIRE DETECTION INSTRUMENTATION

INSTRUMENT LOCATION			TOTAL NUMBER OF INSTRUMENTS**		
FIRE ZONE*	ROOM OR AREA	ELEV	HEAT	IONIZATION	PHOTOELECTRIC
Control Building (Continued)					
311NZ	Computer Battery Room	214'-0"	NA	3	NA
312NWZ	Div II Cable Area	214'-0"	NA	9	NA
321NW	Div I Riser Area	237'-0"	NA	4	NA
322NW	Div I Cable Area	237'-0"	NA	14	NA
323NW	Div II Cable Area	237'-0"	NA	15	NA
324NW	Div II Riser Area	237'-0"	NA	4	NA
325NW	Div I Cable Area	237'-0"	NA	5	NA
326NW	Div II Cable Area	237'-0"	NA	5	NA
327NW	Div III Cable Area	237'-0"	NA	6	NA
331NW	Corridor	261'-0"	NA	20	NA
332NW	Div I Cable Chase	261'-0"	NA	5	NA
333XL	Div I Switchgear Room	261'-0"	NA	7	NA
334NZ	Div I Battery Room	261'-0"	NA	4	NA
335NZ	Div II Battery Room	261'-0"	NA	4	NA
336XL	Div II Switchgear Room	261'-0"	NA	7	NA
337NW	Div II & III Cable Chase	261'-0"	NA	5	NA
338NZ	Remote Shutdown Room B	261'-0"	NA	2	NA
339NZ	HPCS Battery Room	261'-0"	NA	1	NA
340NZ	Div I Chiller Room	261'-0"	NA	2	NA
341NZ	Div II Chiller Room	261'-0"	NA	2	NA

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

ISOLATION VALVE NO.	VALVE FUNCTION	VALVE GROUP	ISOLATION SIGNAL(a)	MAXIMUM CLOSING TIME (SECONDS)
2ICS*MOV122(n)	ICS turbine exhaust to SP Outside IV	12	RM	NA
2ICS*MOV126	ICS to RPV Outside IV	12	RM	NA
2NMS*VEX1 A, B, C, D, E(d)	Traversing Incore Probe Shear Outside IVs	12	RM	NA
2FWS*MOV21 A,B	Feedwater to RPV Outside IVs	12	RM	NA
2WCS*MOV200	WCS to RPV Outside IV	12	RM	NA
2RHS*MOV26 A,B(c)	RHS HX vent Inboard IVs	12	RM	NA
2RHS*MOV27 A,B(c)	RHS HX vent Outboard IVs	12	RM	NA
2MSS*SOV97 A,B,C, D(n)(o)	Main Steam Line Drains	12	RM	NA
2SLS*MOV5 A,B(g)	SLS to RPV Outside IV	12	RM	NA
C. Manual				
2SAS*HCV160	SAS to Drywell Outside IV			
2SAS*HCV161	SAS to Drywell Outside IV			
2SAS*HCV162	SAS to Drywell Inside IV			
2SAS*HCV163	SAS to Drywell Inside IV			
2AAS*HCV134	AAS to Drywell Outside IV			
2AAS*HCV135	AAS to Drywell Outside IV			
2AAS*HCV136	AAS to Drywell Inside IV			
2AAS*HCV137	AAS to Drywell Inside IV			
2RHS*V192	RCIC/RHS Vacuum Breaker Outside IV			
2SFC*V203	Inner Refuel Seal Leakoff Outboard IV			
2SFC*V204	Inner Refuel Seal Leakoff Inboard IV			

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

TABLE NOTATION

* Isolates on injection signal, not primary containment isolation signal.

(a) See Specification 3.3.2, Table 3.3.2-4, for valve groups operated by isolation signal(s).

(b) Deleted.

(c) These valves are the RHR heat exchangers vent lines isolation valves. The vent line connects to the RHR safety relief valves (SRVs) Discharge Header before it penetrates the primary containment. The position indicators for these valves are provided in the Control Room for remote manual isolation.

(d) Type C leakage tests not required.

(e) The associated instrument lines shall not be isolated during Type A testing. Type C testing is not required. These valves shall be tested in accordance with Surveillance Requirement 4.6.3.4.

(f) These valves are check valves, located on the vacuum breaker lines for RHR SRVs discharge headers. The SRV discharge header terminates under pool water and therefore has no containment isolation valves other than those on lines feeding into it.

(g) 2SLS*MOV5A and B are globe stop check valves. These valves close upon reverse flow. The motor operator is provided to remote manually close the valve from the control room.

(h) These valves are testable check valves. They close upon reverse flow. The air operator on each valve is provided only for periodic testing of the valve. These valves can only be tested against a zero d/p.

(i) Valves are maintained closed, ~~and~~ the FPW lines are capped. Valves are Type C tested.

(j) Not primary containment penetration isolation valves. These valves close on an isolation signal to provide integrity of "A" and "B" LPCI loops.

(k) Valves close on a SCRAM signal; not part of primary containment isolation system but are included here for Type C testing per Specification 3.6.1.2. These valves are not required to be OPERABLE per this specification but are required to be OPERABLE per Specification 3.1.3.1.

(l) Not subject to Type A or Type C leak test because of constant monitoring under constant 1800 psig pressure and the possible detrimental effects of shutdown.

(m) Not subject to Type C test per 10 CFR 50, Appendix J. A hydrostatic test is performed in accordance with Specification 4.6.1.2.d.3.

(n) These valves are Type C tested in the reverse direction.

(o) These valves are Type C tested in the reverse direction. Not Primary containment penetration isolation valves.