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SUBJECT: Provides status of actions in response to Generic Ltr 89-04. Evaluation of alternatives to full flow testing of check valves will be completed by end of Second Quarter 1991.

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FEB 7 1991

Director of Nuclear Reactor Regulation
Attention: Dr. W.R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
STATUS OF ACTIONS FOR GENERIC LETTER 89-04 Docket Nos. 50-387
PLA-3497 FILES R41-2 and 50-388

Dear Dr. Butler:

The purpose of this letter is to provide you with a status and revised schedule when all sections of Generic Letter 89-04 will be implemented. The following is the updated status of the Susquehanna SES IST programs with respect to each of the positions in the generic letter.

1. Full Flow Testing of Check Valves

   PP&L is continuing its evaluation of the best method of testing each of the 79 check valves. Most of these check valves have been evaluated. The evaluation will be completed by the end of the Second Quarter of 1991.

2. Alternative To Full Flow Testing of Check Valves

   As part of the evaluation described in response to Position 1, this type of alternative will be considered. This evaluation will be completed by the end of the Second Quarter of 1991.

3. Back Flow Testing of Check Valves

   As discussed in our letter (PLA-3261) dated October 3, 1989, the procedures which govern the testing of 28 pump discharge check valves must be revised to incorporate the testing of these valves in the closed position. The following procedures have been revised and implemented:

SO-116-003	SO-151-002	SO-054-003
SO-216-003	SO-251-002	
SO-149-002	SO-153-004	
SO-249-002	SO-253-004	

   The implementation of these procedures has completed this item.

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4. Pressure Isolation Valves

As stated in our previous letter, the pressure isolation valves in the IST Program are already tested in accordance with this position.

5. Limiting Values of Full-Stroke Times for Power Operated Valves

PP&L has completed its preliminary analysis to re-establish all limit stroke times for power operated valves. This analysis will be approved prior to the end of the Second Quarter of 1991.

6. Stroke Time Measurements for Rapid-Acting Valves

PP&L has completed its preliminary analysis of its rapid-action valves. This analysis will be approved prior to the end of the Second Quarter of 1991.

7. Testing Individual Control Rod Scram Valves in Boiling Water Reactors (BWRS)

A revision to Relief Request #17 to conform to this position has been made and will be submitted in the next revision to the IST Program.

8. Starting Point for Time Period in Technical Specification ACTION Statements

All procedures have been revised to delete any reference to this evaluation period. These procedures included those referenced in Item 3 of this letter and SO-152-002 and SO-252-002. However, as stated in our previous letter, PP&L is reviewing its position on the ASME Code, Section XI, IWP3220 elimination of the evaluation period prior to entering the applicable Limiting Condition for Operation. If an exception to the generic letter position is determined to be warranted, we will document our revised position with ASME Section XI relief request prior to implementation.

9. Pump Testing Using Minimum-Flow Between Line With or Without Flow Measuring Devices

As stated in our previous letter, all pump testing in the Susquehanna SES IST Program is done under full or substantial flow conditions with the appropriate pump performance parameters being measured.

10. Containment Isolation Valve Testing

PP&L has developed leakage rates for the containment isolation valves and has incorporated them in the IST Program. The leakage rates for the containment isolation valves are contained in procedure AD-QA-412.

11. IST Program Scope

As stated in our previous letter, PP&L has concluded that the IST Program addresses the applicable components and systems.

Based upon the scheduled completion of the above tasks and considering the resource impacts imposed by our Unit 2 Fourth Refueling and Inspection Outage, we expect all IST program documents and implementing procedures to be revised and implemented by the end of the Fourth Quarter of 1991. This will complete all actions associated with Generic Letter 89-04.

The schedule for completion of the evaluations of each of the positions has been extended due to several factors. The scope of the activities to be performed on the evaluations of the check valves and power operated valves was greatly expanded. The original scope of activities was to do enough evaluations to satisfy the requirements of Generic Letter 89-04. However, it was decided that additional calculations to support design basis reconstitution would be performed. Also, the compilation of the evaluations of the power operated valves was impacted by the scope of Generic Letter 89-10. It was decided to do an evaluation which would encompass the scope of both Generic Letter 89-04 and Generic Letter 89-10.

If you have any questions, please contact C.T. Coddington at (215) 774-7915.

Very truly yours,

H. W. Keiser

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