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50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
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RECIP. NAME RECIPIENT AFFILIATION
BUTLER, W.R. Project Directorate I-2

SUBJECT: Request NRC staff approval of Relief Request Number 52 to
Inservice testing of pumps & valves programs for Susquehanna
SES Units 1 & 2.

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Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

MAR 11 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
REQUEST FOR APPROVAL OF RELIEF REQUEST
NO. 62 TO THE IST PROGRAM
PLA-3532 FILE R41-2

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

The purpose of this letter is to request NRC staff approval of Relief Request No. 62 to the Inservice Testing of Pumps and Valves Programs for Susquehanna SES Units 1 and 2. This relief request will reduce the unnecessary entry into Technical Specification Action Statements without decreasing safety margin.

We request that the relief request be approved by 8/1/91.

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

Very truly yours,

H. W. Keiser

Attachment

cc: Document Control Desk (original)
NRC Region I
Mr. G.S. Barber, NRC Sr. Resident Inspector
Mr. J.J. Raleigh, NRC Acting Project Manager

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RELIEF REQUEST NUMBER 62

System: RHRSW, RHR, Core Spray, HPCI, SBLC, and ESW
P&ID: Unit 1-M-112, M-151, M-152, M-155, M-148, and M-111
Unit 2-M-2112, M-2151, M-2152, M-2155 and M-2148
Pumps: RHRSW, RHR, Core Spray, HPCI, SBLC, and ESW Pumps
Class: As applicable.
Function: As applicable.
Impractical Test Requirement:

Paragraph IWP-3230(b) Corrective Action requirement that if deviations fall within the "Required Action Range" of Table IWP-3100-2, the pump shall be declared inoperative and not returned to service until the cause of the deviation has been determined and the condition corrected.

Basis For Relief:

Table IWP-3100-2 has two sub-parts for the Required Action Range that it establishes. One is entitled "Low Values" and the other "High Values". Application of the IWP-3230(b) requirement that the pump must be declared inoperative and not returned to service until the (system) condition causing an excursion of the pump flowrate or differential pressure test quantities beyond the "High Value" limits of the Required Action Range has been both determined and corrected, reduces the flexibility needed for operation of the plant in the most effective manner.

The purpose of the test is to determine pump degradation. High values of the performance test quantities have never been indicative of pump degradation. They are indicative of instrumentation or system changes. Such anomalies warrant prompt investigation and resolution; but in no way justify any declaration of pump inoperability.

The unnecessary removal of pumps from service and consequent entry into Tech Spec Action Statements without technical basis could result in decreased safety margin and in unnecessary plant shutdowns and transients.

Alternative Testing:

In those situations where pump flowrate or differential pressure measurements make excursions above the "High Value" limits of their respective Required Action Ranges, the cause of the deviation will be determined as expeditiously as possible and prior to the expiration of the surveillance interval. The causative condition (of the test system or test instrumentation) will be corrected prior to successful completion of the affected test; or corrective action will be taken per IWP-3230(c). The pump will not be declared inoperative and will not be removed from service unless the cause of the deviation has been determined to be the pump or the surveillance interval has expired.



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