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SUBJECT: Provides response to NRC 950426 ltr, which contained SE of IST program relief requests for pumps & valves for second 10-yr interval.

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U.S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NRC SER ON THE IST PROGRAM
PLAN FOR THE SECOND 10-YEAR INTERVAL
PLA-4340 FILE R41-2**

Docket Nos. 50-387
and 50-388

This letter provides PP&L's response to the NRC's letter dated April 26, 1995, which contained the Safety Evaluation of the Inservice Testing Program Relief Requests for Pumps and Valves for the Second 10-Year Interval. Our response was due to NRC by July 26, 1995. Additional time was required to finalize our response to NRC's Safety Evaluation. This was discussed between PP&L's Mr. J.M. Kenny and NRC's Mr. C. Poslusny on July 26, 1995. The actions described herewith will be incorporated into a revision to the IST Program Plans and submitted to the NRC for review.

1. SER 2.2 Relief Request No. 11 - High Pressure Coolant Injection Pumps (Units 1 & 2)

NRC Evaluation:

Relief denied. The licensee should comply with the Code, or revise and resubmit the request with additional test data.

PP&L Response:

Relief request will be withdrawn and deleted in a future revision on the IST Program Plans. Program documents have been revised to comply with the Code requirements.

2. SER 3.2 Relief Request No. 7 - Control Rod Drive Hydraulic Valves (Units 1 & 2)

NRC Evaluation:

Relief denied. The licensee should comply with the Code requirements or revise and resubmit this request as appropriate.

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PP&L Response:

Relief request will be withdrawn and deleted in a future revision on the IST Program Plans. We are currently in compliance with Code requirements.

3. SER 3.4 Relief Request No. 13 Control Structure Chilled Water Temperature Control Valves (Unit 1)

NRC Evaluation:

Relief denied. The licensee must revise and resubmit this relief request to propose method for monitoring these valves individually for degradation.

PP&L Response:

Relief Request Number 13 is requested to remain in effect for TV-08643A/B, TV-08652A/B and TV-08662A/B, which are the non-code valves that were in the initial Relief Request #13 submitted as part of the IST 10-Year update. Testing the operation of the Control Structure Chilled Water System on a quarterly basis and monitoring the discharge temperatures is sufficient to verify proper operation of the subject valves.

The Code valves that were subject of the Relief Request #13, TV-08612A/B, are being withdrawn from the Relief Request and will be tested in accordance with the ASME Code requirements as specified in OMA-1988 Part 10.

4. SER 3.5 Relief Request No. 21 - Air Operated Valves (Units 1 & 2)

NRC Evaluation:

Relief denied. The licensee may revise and resubmit this relief request to discuss the impracticality of basing the reference stroke times on those resulting from averaging a specific number of tests performed following maintenance activity, averaging several IST tests, or using the first test following maintenance versus those required by OMA-1988 Part 10, Paragraph 4.2.1.8.

PP&L Response:

Relief request will be withdrawn and deleted in a future revision on the IST Program Plans. Program documents are currently in compliance with Code requirements.



5. **SER 3.6 Relief Request No. 22 Emergency Switchgear Room Cooling Pressure Control Valves (Unit 2)**

NRC Evaluation:

Relief denied. The licensee must revise and resubmit this relief request to propose a method for monitoring these valves individually for degradation, and discuss the impracticality of stroke time measurement of the valve operation from the fully closed to the throttled position during the quarterly part-stroke exercising tests or during the full-stroke open testing which the licensee says in the relief request is performed every 18 months, and to discuss the impracticality of observing the remote position indicator locally at least once every 2 years, as required by OMA-1988, Part 10, Paragraph 4.1.

PP&L Response:

Relief request will be withdrawn and deleted. The subject valves will be tested in accordance with the ASME Code requirements as specified in OMA-1988 Part 10.

6. **SER 4.2 Refuel Outage Test Justification No. 20 - Containment Isolation Excess Flow Check Valves**

NRC Evaluation:

Based on a recent excess flow check valve test conducted at power at Unit 1, the staff has identified the need for additional information regarding this refueling outage justification. Accordingly, we recommend the ROJ-20 be revised to clarify the impracticality of performing the quarterly full-stroke test for the excess flow check valves listed and recommends that PP&L submit a request for an alternate frequency if appropriate.

PP&L Response:

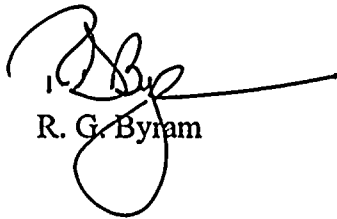
Refuel Outage Justification (copy attached) was revised to clarify the impracticality of performing the quarterly full-stroke testing. The valve listing was revised to include only those valves where it is not practical to perform such testing during power operations and testing will be deferred to a refueling outage period.

The performance of the testing creates an increased possibility of either spurious or accidental plant shutdowns with the associated potential for unnecessary challenges to safety systems, due to the associated risks of removing instrumentation channels from service for testing. The operational readiness of these valves is adequately determined when tested in accordance with Technical Specifications 4.6.3.4 on an 18 month frequency. Testing on a quarterly basis is deemed impractical since the risk of performing the test quarterly outweighs the benefit achieved with a quarterly test. It is considered that quarterly testing could cause unnecessary challenges to safety systems, and thereby reduce the plant's margin of safety.

In response to the NRC's concern that some excess flow check valves were tested at power, a request for alternative test frequency is being submitted (copy attached) for the valves that are tested on an 18-month frequency during power operations preceding a Refueling Outage.

If you have any questions, please contact Mr. C. T. Coddington at (610) 774-7531.

Very truly yours,



R. G. Byram

Attachment

copy: NRC Region I
Ms. M. Banerjee NRC Sr. Resident Inspector
Mr. C. Poslusny NRC Sr. Project Manager

REFUELING OUTAGE TEST JUSTIFICATION NUMBER 20

SYSTEM	P & ID	VALVE
RPV	M-142	XV-14201
		XV-14202
		XV-142F041
		XV-142F043A
		XV-142F043B
		XV-142F045A
		XV-142F045B
		XV-142F047A
		XV-142F047B
		XV-142F051A
		XV-142F051B
		XV-142F055
		RHR
XV-15109B		
Core Spray	M-152	XV-152F018A
		XV-152F018B

1R20-1

REFUELING OUTAGE TEST JUSTIFICATION NUMBER 20 (Cont'd)

Category: C

Class: 1

Function: Containment Isolation

Impractical Test Requirement: Exercise test valve once per 92 days.

Basis for Deferment: Excess flow check valves are installed on instrument lines penetrating containment in accordance with Regulatory Guide 1.11. As such, the lines are sized and/or orificed such that off-site doses will be substantially below 10CFR100 limits in the event of a rupture. Therefore, individual leak rate testing of these valves is not required for conformance with 10CFR50, Appendix J requirements.

Functional testing of valves to verify closure can be accomplished by the process of venting the instrument side of the valve while the process side is under pressure. Such testing is required by Technical Specification 4.6.3.4 at least once per 18 months. Testing on a more frequent basis is not feasible for several reasons. Instruments serviced by these valves frequently have interlock or actuation functions that would be interfered with should testing be attempted during plant operation. This would impose unnecessary challenges to safety systems and would reduce the plant's margin of safety. Also, process liquid will be contaminated to some degree, requiring special measures to collect flow from the vented instrument side

Alternative Testing: Functional testing with verification that flow is checked will be performed at least once per 18 months per Technical Specification 4.6.3.4.

RELIEF REQUEST NUMBER 23

SYSTEM	P & ID	VALVE	SYSTEM	P & ID	VALVE
MSIV-LCS (183)	M-139	XV-13910B	RPV (continued)	M-142	XV-142F053C
		XV-13910F			XV-142F053D
		XV-13910K			XV-142F057
		XV-13910P			XV-142F059A
RPV	M-141	XV-141F009			XV-142F059B
Main Steam	M-141	XV-141F070A			XV-142F059C
		XV-141F070B			XV-142F059D
		XV-141F070C			XV-142F059E
		XV-141F070D			XV-142F059F
		XV-141F071A			XV-142F059G
		XV-141F071B			XV-142F059H
		XV-141F071C			XV-142F059L
		XV-141F071D			XV142F059M
		XV-141F072A			XV-142F059N
		XV-141F072B			XV-142F059P
		XV-141F072C			XV-142F059R
		XV-141F072D			XV-142F059S
		XV-141F073A			XV-142F059T
		XV-141F073B			XV-142F059U
		XV-141F073C			XV-142F061
		XV-141F073D	RXR	M-143	XV-143F003A
RPV	M-142	XV-142F051C			XV-143F003B
		XV-142F051D			XV-143F004A
		XV-142F053A			XV-143F004B
		XV-142F053B			XV-143F009A



RELIEF REQUEST NUMBER 23

SYSTEM	P & ID	VALVE	SYSTEM	P & ID	VALVE
RXR (continued)	M-143	XV-143F009B	RCIC	M-149	XV-149F044A
		XV-143F009C			XV-149F044B
		XV-143F009D			XV-149F044C
		XV-143F010A			XV-149F044D
		XV-143F010B	HPCI	M-155	XV-155F024A
		XV-143F010C			XV-155F024B
		XV-143F010D			XV-155F024C
		XV-143F011A			XV-155F024D
		XV-143F011B	RHR	M-151	XV-15109C
		XV-143F011C			XV-15109D
		XV-143F011D			
		XV-143F012A			
		XV-143F012B			
		XV-143F012C			
		XV-143F012D			
		XV-143F040A			
		XV-143F040B			
		XV-143F040C			
		XV-143F040D			
		XV-143F057A			
		XV-143F057B			
RWCU	M-144	XV-14411A			
		XV-14411B			
		XV-14411C			
		XV-14411D			
		XV-144F046			

RELIEF REQUEST NUMBER 23 (continued)

Category: C

Class: 1

Function: Containment Isolation

Impractical Test Requirement: Exercise test valve once per 92 days.

Basis for Deferment: Excess flow check valves are installed on instrument lines penetrating containment in accordance with Regulatory Guide 1.11. As such, the lines are sized and/or orificed such that off-site doses will be substantially below 10CFR100 limits in the event of a rupture. Therefore, individual leak rate testing of these valves is not required for conformance with 10CFR50, Appendix J requirements.

Functional testing of valves to verify closure can be accomplished by the process of venting the instrument side of the valve while the process side is under pressure. Such testing is required by Technical Specification 4.6.3.4 at least once per 18 months. Testing on a more frequent basis is impractical for several reasons. The testing described above requires the removal of the associated instrument or instruments from service. Since these instruments are in use during plant operation, removal of any of these instruments from service may cause a spurious signal which could result in a plant trip or an unnecessary challenge to safety systems. Testing on a quarterly basis is deemed impractical since the risk of performing the test quarterly outweighs the benefit achieved with a quarterly test since the quarterly testing would reduce the plant's margin of safety.

Alternative Testing: Functional testing with verification that flow is checked will be performed at least once per 18 months per Technical Specification 4.6.3.4.



REFUELING OUTAGE TEST JUSTIFICATION NUMBER 20

SYSTEM	P & ID	VALVE
RPV	M-2142	XV-24201
		XV-24202
		XV-242F041
		XV-242F043A
		XV-242F043B
		XV-242F045A
		XV-242F045B
		XV-242F047A
		XV-242F047B
		XV-242F051A
		XV-242F051B
		XV-242F055
RHR	M-2151	XV-25109A
		XV-25109B
Core Spray	M-2152	XV-252F018A
		XV-252F018B

REFUELING OUTAGE TEST JUSTIFICATION NUMBER 20 (Cont'd)

Category: C

Class: 1

Function: Containment Isolation

Impractical Test Requirement: Exercise test valve once per 92 days.

Basis for Deferment: Excess flow check valves are installed on instrument lines penetrating containment in accordance with Regulatory Guide 1.11. As such, the lines are sized and/or orificed such that off-site doses will be substantially below 10CFR100 limits in the event of a rupture. Therefore, individual leak rate testing of these valves is not required for conformance with 10CFR50, Appendix J requirements.

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Alternative Testing: Functional testing with verification that flow is checked will be performed at least once per 18 months per Technical Specification 4.6.3.4.

RELIEF REQUEST NUMBER 23

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MSIV-LCS (183)	M-2139	XV-23910B	RPV (continued)	M-2142	XV-242F053C
		XV-23910F			XV-242F053D
		XV-23910K			XV-242F057
		XV-23910P			XV-242F059A
RPV	M-2141	XV-241F009			XV-242F059B
Main Steam	M-2141	XV-241F070A			XV-242F059C
		XV-241F070B			XV-242F059D
		XV-241F070C			XV-242F059E
		XV-241F070D			XV-242F059F
		XV-241F071A			XV-242F059G
		XV-241F071B			XV-242F059H
		XV-241F071C			XV-242F059L
		XV-241F071D			XV242F059M
		XV-241F072A			XV-242F059N
		XV-241F072B			XV-242F059P
		XV-241F072C			XV-242F059R
		XV-241F072D			XV-242F059S
		XV-241F073A			XV-242F059T
		XV-241F073B			XV-242F059U
		XV-241F073C			XV-242F061
		XV-241F073D	RXR	M-2143	XV-243F003A
RPV	M-2142	XV-242F051C			XV-243F003B
		XV-242F051D			XV-243F004A
		XV-242F053A			XV-243F004B
		XV-242F053B			XV-243F009A

RELIEF REQUEST NUMBER 23 (continued)

SYSTEM	P & ID	VALVE	SYSTEM	P & ID	VALVE
RXR (continued)	M-2143	XV-243F009B	RCIC	M-2149	XV-249F044A
		XV-243F009C			XV-249F044B
		XV-243F009D			XV-249F044C
		XV-243F010A			XV-249F044D
		XV-243F010B	HPCI	M-2155	XV-255F024A
		XV-243F010C			XV-255F024B
		XV-243F010D			XV-255F024C
		XV-243F011A			XV-255F024D
		XV-243F011B	RHR	M-2151	XV-25109C
		XV-243F011C			XV-25109D
		XV-243F011D			
		XV-243F012A			
		XV-243F012B			
		XV-243F012C			
		XV-243F012D			
		XV-243F040A			
		XV-243F040B			
		XV-243F040C			
		XV-243F040D			
		XV-243F057A			
		XV-243F057B			
RWCU	M-2144	XV-24411A			
		XV-24411B			
		XV-24411C			
		XV-24411D			
		XV-244F046			

RELIEF REQUEST NUMBER 23 (continued)

Category: C

Class: 1

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