

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9205280241 DOC. DATE: 92/05/27 NOTARIZED: NO DOCKET #
 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 SAGAR, D.A. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards temporary request for relief from alternative testing (disassembly/insp) of HPSI pump mini-flow check valve V-3103. Approval needed to support Mode 4 operation currently scheduled for 920613.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	PD2-2 LA		1	0		PD2-2 PD		1	1
	NORRIS, J		2	2					
INTERNAL:	ACRS		6	6		NRR/DET/ECMB 9H		1	1
	NRR/DET/EMEB 7E		1	1		NUDOCS-ABSTRACT		1	1
	OC/LEMP		1	0		OGC/HDS3		1	0
	REG FILE 01		1	1		RES MILLMAN, G		1	1
	RES/DSIR/EIB		1	1					
EXTERNAL:	EG&G BROWN, B		1	1		EG&G RANSOME, C		1	1
	NRC PDR		1	1		NSIC		1	1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 19

MAY

R
I
D
S
/
A
D
D
S



May 27, 1992

L-92-160
10 CFR 50.4
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

RE: St. Lucie Unit 2
Docket No. 50-389
In Service Test Program
Temporary Relief Request - Check Valve Inspection

Florida Power and Light Company (FPL) requests relief from the alternative testing (i.e., disassembly and inspection) of the high pressure safety injection (HPSI) pump mini-flow check valve (V-3103) scheduled for the Spring 1992 Unit 2 refueling outage. The bases for the one time relief is attached. Approval of this request is needed by to support Mode 4 operation which is currently scheduled for June 13, 1992.

Please contact us if there are any questions about this submittal.

Very truly yours,

D. A. Sager
Vice President
St. Lucie Plant

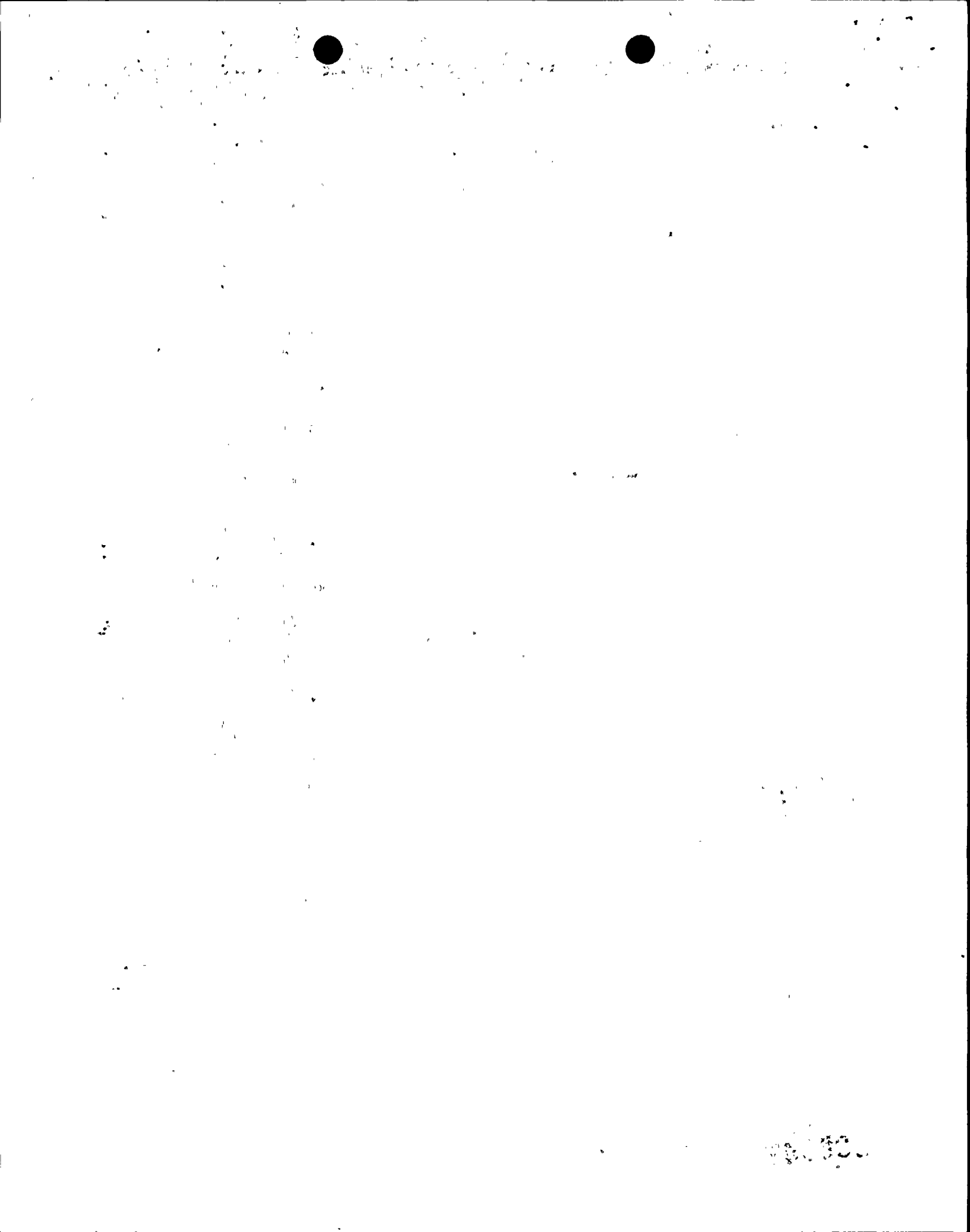
DAS/GRM/kw

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

DAS/PSL #707-92

9205280241 920527
PDR ADCK 05000389
PDR

AD47



TEMPORARY RELIEF REQUEST

BASIS FOR RELIEF:

St. Lucie Unit 2 is preparing to submit an updated IST program (see enclosed copy of proposed relief request). The program has been changed to conform to the guidance set forth in Generic Letter 89-04. St. Lucie has been performing substantial flow pump testing and full flow exercising of check valves for Unit 2 since the 1990 refueling outage. In the few instances where full flow exercising of a particular group of check valves is not possible, valve disassembly and inspection has been performed. The two High Pressure Safety Injection (HPSI) pump mini-flow recirculation line check valves, V-3102 and V-3103, are such valves.

St. Lucie's response (L-92-38 dated 2/25/92) to the latest Unit 2 Safety Evaluation Report, which was issued by the NRC letter dated December 5, 1991, stated that one of these two valves would be disassembled each refueling outage. During the 1990 refueling outage, one of the two HPSI pump mini-flow recirculation line check valves (V-3102) was disassembled and inspected. This inspection was satisfactory. However the disassembly and re-assembly of the check valve took considerable effort. These valves are 2 inch, seal welded, stainless steel, piston check valves. Once the seal weld is cut, the valve cover must be removed by unthreading it. Since both the valve body and cover are finely threaded stainless steel, they have a high potential for galling while being unthreaded. The valve was re-assembled but will require replacement if disassembly is required again.

Following the 1990 refueling outage, an order for replacement valves was submitted in anticipation of the 1992 refueling outage disassembly of the other HPSI check valve (V-3103). However, neither the required parts nor a suitable replacement valve have been available. Because of the lack of replacement valves and the high likelihood of valve damage during disassembly, St. Lucie requests relief per 10 CFR 50.55.a.(g).5.iii to defer disassembly of V-3103 until the Fall 1993 refueling outage. Valve, V-3102, will be inspected during the spring 1995 refueling outage. Concurrent efforts are under way to procure the necessary parts for disassembly or change the valve type to one that can be inspected more readily.

FPL is active in the Nuclear Industry Check valve group (NIC) which is developing non-intrusive test techniques for verifying check valve performance. St. Lucie is currently working with ITI MOVATS to evaluate their non-intrusive test equipment for applicability on these check valves. Should FPL identify another method to verify check valve performance, then disassembly of these valves will not be required.

RELIEF REQUEST NO. VR-30

SYSTEM:

Safety Injection System (2998-G-078, Sh 130)

COMPONENTS:

V-3102
V-3103

CATEGORY:

C

FUNCTION:

These valves open to provide for mini-flow recirculation flowpaths from the high pressure safety injection pumps to the refueling water tank. This minimum flow through the respective pumps removes pump heat in the event they are operating under low or no flow conditions. They close during shutdown cooling and long-term recirculation to prevent recirculation through the idle pump(s).

SECTION XI REQUIREMENT:

Check valves shall be exercised at least once every 3 months, except as provided by IWV-3522. (IWV-3521)

BASIS FOR RELIEF:

There is no installed flowrate instrumentation available to verify valve full-stroke exercising as required by Generic Letter 89-04, Position 1.

RELIEF REQUEST NO. VR-30 (cont.)

ALTERNATE TESTING:

During quarterly pump testing each of these valves will be partial-stroke exercised (open) via recirculation through the minimum flow test circuits with no flow measurements.

During cold shutdown, these valves will be backflow tested.

During each reactor refueling outage at least one of the two HPSI pump valves will be disassembled, inspected, and manually stroked to verify operability. Inspections shall be scheduled such that valves will be checked in a rotating sequence such that each valve is subject to inspection at least once every three (3) years. Should a valve under inspection be found to be inoperable, then the other valve will be inspected during the same outage, after which the rotational inspection schedule will be re-initiated. This satisfies the requirements of Generic Letter 89-04, Position 2.



11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100