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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 SAGER, D.A. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards inservice test program Relief Requests VR-18 & VR-30 for check valve V-15328 & check valves V-3102 & V-3103 respectively. Alternatives provide acceptable level of quality & safety or compliance would create hardship.

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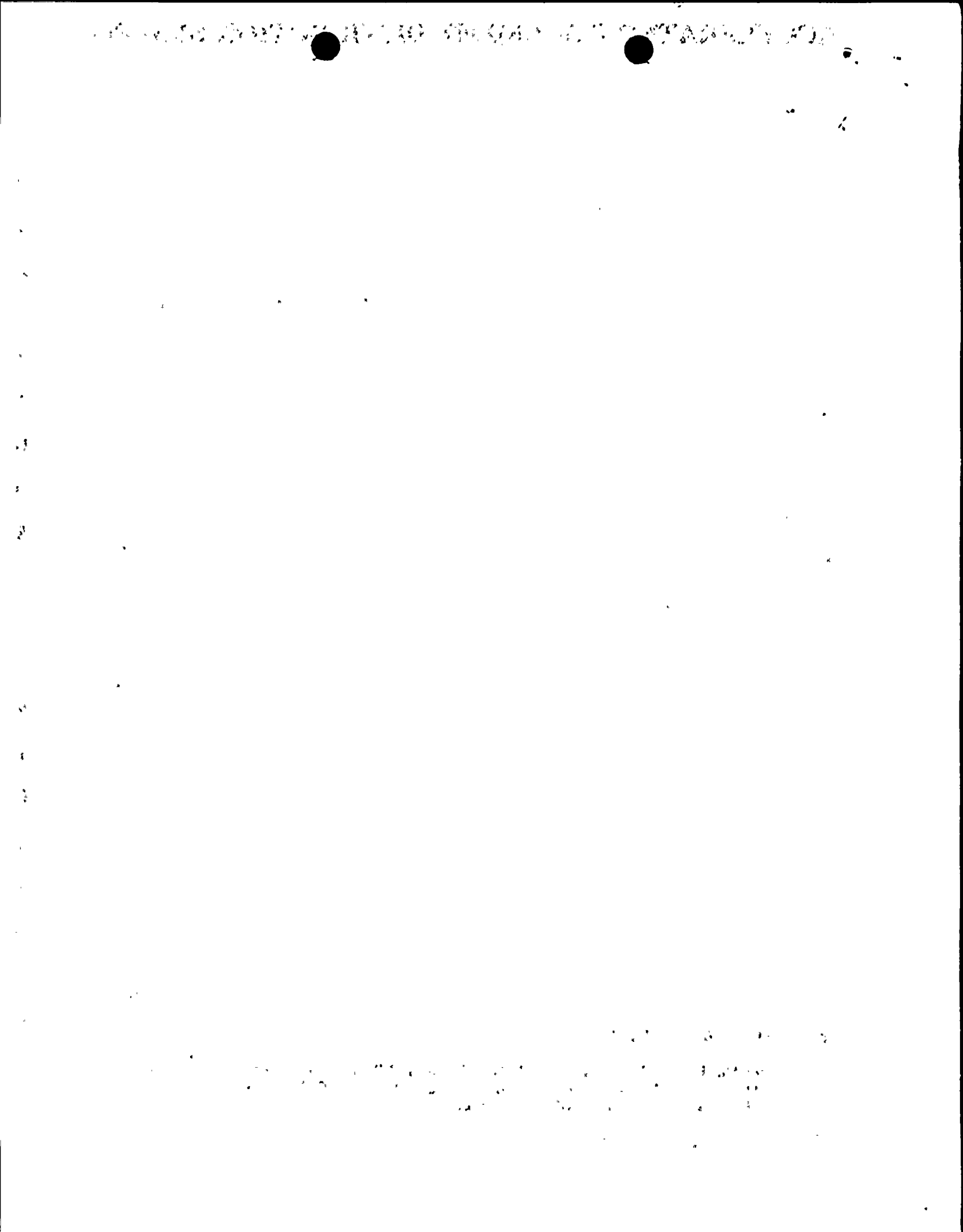
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January 13, 1993

L-93-10
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
Relief Requests VR-18 and VR 30 - Check Valve Testing

Pursuant to 10 CFR 50.55a (a)(3), Florida Power and Light Company (FPL) requests approval of modified relief requests VR-18 for check valve V-15328 and VR-30 for check valves V-3102 and V-3103. FPL has determined pursuant to 10 CFR 50.55a (a)(3) that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

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 #842-93

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RELIEF REQUEST NO. VR-18

SYSTEM:

Makeup Water (2998-G-084)

COMPONENT:

V-15328

CATEGORY:

A/C

FUNCTION:

This valve closes to provide primary containment for the penetration related to the makeup water supply line to the containment building.

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:

This is a simple check valve with no external means of position indication, thus the only practical means of verifying closure is by performing a leak test or back flow test. This test would require a considerable effort since this system is the only source of fire fighting water for the containment building. In order to back flow or leak test the check valve, this system would have to be isolated. In order to isolate the system, an alternate source of fire fighting water would first have to be supplied to the containment building. This would require rigging several fire hoses through the maintenance hatch to the various fire fighting stations in the containment building. This would constitute an undue burden to perform this test during normal operation and during cold shutdowns.

Revision 3
12/31/92

RELIEF REQUEST NO. VR-18 (cont.)

ALTERNATE TESTING:

At least once every two (2) years, this valve will be verified to close in conjunction with the Appendix J leak testing program.

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 flow paths 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.

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 flow rate instrumentation available to verify valve full-stroke exercising as required by Generic Letter 89-04, Position 1. As per NCR 2-507, these check valves have no safety function in the closed condition.

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 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.

St. Lucie Unit 2 was granted a one time relief by the NRC for the disassembly of V-3103 during the 1992 refueling outage. Both check valves must be disassembled during the next refueling outage in the fall of 1993. See NRC SER letter from Herbert N. Berkow to J. H. Goldberg dated 2 June 1992.



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