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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
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 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Forwards modified Relief Request VR-22 for check valves V-07269 & V-07270 for approval. Util has determined that per 10CFR50.a(a)(3) that proposed alternatives would provide acceptable level of quality & safety.

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P.O. Box 128, Ft. Pierce, FL 34954-0128

April 19, 1993

L-93-101
10 CFR 50.4
10 CFR 50.a

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

RE: St. Lucie Unit 1
Docket No. 50-335
In-Service-Test Program
Relief Request VR-22 - Check Valve Testing

Pursuant to 10 CFR 50.a(a)(3), Florida Power and Light Company (FPL) requests approval of modified relief request VR-22 for check valves V-07269 and V-07270. FPL has determined pursuant to 10 CFR 50.a(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.

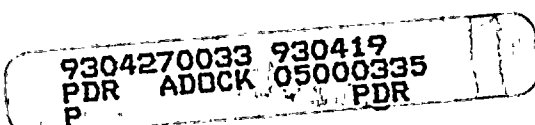
Very truly yours,

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 #903-93



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St. Lucie Unit 1
Docket No. 50-335
In-Service-Test Program
Relief Request VR-22 - Check Valve Testing

RELIEF REQUEST NO. VR-22

SYSTEM:

Containment Spray (8770-G-088)

COMPONENTS:

V-07269
V-07270

CATEGORY:

C

FUNCTION:

These valves open to provide a flowpath from the respective containment spray header to the spray additive eductors. This flow through the eductors provides the motive force to inject a sodium hydroxide solution into the suction of the containment spray pumps. These check valves close upon the failure of one containment spray pump following an accident. The check valve in the failed train closes to prevent back flow from the operating header to the idle containment spray header.

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:

These check valves cannot be full flow exercised during normal operation. There is no flowrate instrumentation available to verify valve full-stroke exercising as required by the Generic Letter 89-04, position 1.

Reverse flow testing of these check valves cannot be performed during any Mode without undue burden. During normal operations, both trains of the containment spray system, including the sodium hydroxide system, must be operable. Attempting a back flow test of either of these valves would require a valve line-up which would place both trains of the sodium hydroxide systems out of service.

To back flow test the two check valves, a source of pressurized borated water must be connected downstream of the check valves. The upstream side of the check valves must be depressurized and

drained in order to collect the back leakage through one of the check valves. The drain valves for these tests are located in the shutdown heat exchanger rooms in the Unit 1 reactor auxiliary building (RAB). The general area radiation levels around the drain valves vary from 50 mRem/Hr to greater than 100 mRem/Hr, the contact radiation levels range from 100 to 1200 mRem/Hr. Approximately 220 feet of 12 inch piping must be drained for each test. Performing these tests would result in unnecessary personnel radiation exposures, possible personnel contaminations, and generate over 2,600 gallons of borated, contaminated water that must be drained, treated, and finally replaced.

Another problem with performing the back flow test is the system line-up for the test. The test must rely upon two 10 inch gate valves to be relatively leak tight against the pressure of shutdown cooling operating in the alternate containment spray header. Leakage through these two 10 inch gate valves (not required to be leaktight), would result in an inaccurate leakage rate measurement for the valves in test. This could result in declaring the check valves inoperative and performing unnecessary maintenance.

ALTERNATE TESTING:

Each of these valves will be partial-stroke exercised quarterly in conjunction with testing of the containment spray pumps.

During each reactor refueling outage at least one of these valves will be disassembled, inspected, and manually stroked to verify both the open and close capabilities. Inspections shall be scheduled such that each valve is subject to inspection at least once every six 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.



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