



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE INSERVICE TESTING PROGRAM REQUESTS FOR RELIEF

FLORIDA POWER & LIGHT COMPANY

ST. LUCIE PLANT, UNIT 2

DOCKET NUMBER 50-389

1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice testing (IST) of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where alternatives have been authorized or relief has been requested by the licensee and granted by the Commission pursuant to Sections (a)(3)(i), (a)(3)(ii), or (f)(6)(i) of 10 CFR 50.55a. In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for its facility. NRC guidance contained in Generic Letter (GL) 89-04, *Guidance on Developing Acceptable Inservice Testing Programs*, provides alternatives to the Code requirements determined acceptable to the staff.

Section 10 CFR 50.55a authorizes the Commission to approve alternatives and to grant relief from ASME Code requirements upon making the necessary findings. The NRC staff's findings with respect to authorizing alternatives and granting or not granting the relief requested as part of the licensee's IST program are contained in this Safety Evaluation (SE).

Furthermore, in rulemaking to 10 CFR 50.55a effective September 8, 1992, (see 57 Federal Register 34666), the 1989 edition of ASME Section XI was incorporated in ¶ (b) of § 50.55a. The 1989 edition provides that the rules for IST of pumps and valves shall meet the requirements set forth in ASME Operations and Maintenance Standards Part 6 (OM-6), "Inservice Testing of Pumps in Light-Water Reactor Power Plants," and Part 10 (OM-10), "Inservice Testing of Valves in Light-Water Reactor Power Plants." Pursuant to (f)(4)(iv), portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met, and subject to Commission approval. Because the alternatives meet later editions of the Code, relief is not required for those inservice tests that are conducted in accordance with OM-6 and OM-10, or portions thereof, provided all related requirements are met. Whether all related requirements are met is subject to NRC inspection.

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The IST program evaluated in this SE covers the second ten-year IST interval for St. Lucie Plant, Unit 2. The interval began August 8, 1993, and ends August 8, 2003. The second ten-year interval IST program is based on the requirements of the 1986 Edition of the ASME Section XI Boiler and Pressure Vessel Code which was incorporated by reference in § 50.55a(b) by Volume 53 Federal Register 16051, dated and effective May 5, 1988.

The NRC has identified a number of generic deficiencies that affect plant safety and have frequently appeared as IST programmatic weaknesses. These are addressed by GL 89-04. In that GL, the staff delineated positions that describe deficiencies and explain alternatives to the ASME Code that the staff considers acceptable. If an alternative is implemented in accordance with the relevant position in the GL, the staff has determined that relief should be granted pursuant to 10 CFR §50.55a(g)(6)(i) on the grounds that it is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest. In making this determination, the staff has considered the burden on the licensee that would result if the requirements were imposed.

Certain relief requests were approved for an interim period of one year, or until the next refueling outage, whichever is later, in a Safety Evaluation (SE) issued August 23, 1993, relating to the first ten-year interval. In that SE, the staff indicated that the interim period could continue into the second ten-year interval in order to give the licensee a period of time to address the issues and determine the appropriate long-term action. The SE also directed the licensee to implement the updated IST program developed for the second ten-year interval at the second interval start date in accordance with the requirements of 10 CFR 50.55a(f)(4)(ii).

The IST program submittal includes 14 relief requests for pumps covering all 22 pumps, 31 relief requests covering 85 valves, and 31 cold shutdown justifications covering 85 valves. The valve table lists approximately 436 valves.

## 2.0 EVALUATION

The Mechanical Engineering Branch, with technical assistance from Brookhaven National Laboratory (BNL), has reviewed the information concerning IST program requests for relief submitted for the St. Lucie Plant, Unit 2, in Florida Power & Light Company's letter dated August 3, 1993.

The staff adopts the evaluations and recommendations for granting relief or authorizing alternatives contained in the attached Technical Evaluation Report (TER) prepared by BNL. Relief is granted from, or alternatives are authorized to, the testing requirements which have been determined to be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, or where the proposed alternative testing provides an acceptable level of quality and safety. Certain relief requests have been approved pursuant to 10 CFR 50.55a (f)(4)(iv) where it has been determined that the proposed alternative is in accordance with the requirements of the

1989 Edition of ASME Section XI, and therefore, relief from Code requirements is not required. When an alternative is approved pursuant to (f)(4)(iv), any applicable related requirements, as listed in the TER, must be implemented, and such implementation is subject to NRC inspection. A summary of the NRC actions is provided in Table 1. Relief requests have also been approved pursuant to GL 89-04. For those requests, the staff, with the assistance of BNL, has determined that the proposed alternatives conform to the relevant positions in the GL.

The IST program relief requests which are granted, authorized, or approved are acceptable for implementation provided the action items identified in Section 5 of the TER are addressed within one year of the date of the SE or by the end of the next refueling outage, whichever is later, including the interim relief requests approved in the August 23, 1993, SE. Additionally, the granting of relief is based upon the fulfillment of any commitments made by the licensee in its basis for each relief request and the alternatives proposed.

Program changes involving new or revised relief requests should be submitted to the NRC. Program changes that meet the positions in GL 89-04, Attachment 1, may be implemented provided the guidance in GL 89-04, Section D, is followed. Program changes that add or delete components from the IST program should be periodically provided to the NRC.

3.0 RELIEF REQUEST VR-13, SAFETY INJECTION TANK TO REACTOR COOLANT SYSTEM CHECK VALVES V-3215, V-3225, V-3235, AND V-3245, AND RELIEF REQUEST VR-14, SAFETY INJECTION HEADERS TO REACTOR COOLANT SYSTEM CHECK VALVES V-3217, V-3227, V-3227, AND V-3247

In addition to the evaluations in Section 3.2.2 and 3.2.3, and discussion in Action Items 4.9 and 4.10, of the TER, the staff provides the following information for the licensee to consider in evaluating the extension of the disassembly and inspection for the safety injection tank discharge check valves and the safety injection headers check valves.

Disassembly and inspection of a check valve is not considered a true substitute for an operability test conducted under operating flow conditions, but is allowed when no other means for testing is available. Under operating conditions the valve internal parts are subjected to dynamic flow loads, pressure gradients, temperature gradients, and flow-induced and system-generated mechanical vibration. Pipe loading on the valve body can affect the alignment of valve internal parts. Any of these conditions, or a combination of these conditions, can alter the valve performance and the effects could be diagnosed during operational testing. However, these operating conditions are not duplicated, and the results may not be apparent, in a disassembly and inspection effort. There have been instances where operational problems were discovered after disassembly/inspections. There are also examples of latent problems caused by the disassembly and inspection efforts, such as installing a bonnet-hung check valve in an incorrect orientation. Certain of these problems could be identified during a partial-flow test or a leakage test following disassembly/inspection, if performed.

In the past, conditions limiting testing of certain check valves justified the use of disassembly and inspection since no other practical test method was available. With the acceptance of nonintrusive methods and the development of other test methods, this justification requires a re-examination (reference NUREG/CP-0123, "Proceedings of the Second NRC/ASME Symposium on Pump and Valve Testing"). GL 89-04, Position 2, was developed prior to wide-spread use of nonintrusive techniques. It allowed disassembly and inspection (D&I) conditionally when other methods were impractical; however, in the public meetings, in response to questions on use of D&I, the staff indicated the use of other alternate techniques, including nonintrusives, were under investigation and were being encouraged by NRC. Allowing D&I on a sampling basis was an extension of the Code required time interval for valve testing. The D&I sample was small and valves in the group were identical in type, size, service conditions, exposure to operating environments, and age. The GL 89-04 sampling interval extension was justified on the basis that one valve in the group would be examined during each refueling outage and the performance of each valve in the group was representative of all the others.

GL 89-04, Position 2, allowed the use of a limited sampling plan to reduce the burden on the licensee to D&I all valves in the group during each refueling. The sampling plan allowed that only one valve in each group be D&I at each refueling rather than disassembling and inspecting all valves in the group. The sampling plan further allowed a different valve in the group be D&I at each refueling and the process be repeated until all valves were inspected. With an 18-month operating fuel cycle, this would ensure that no valve D&I interval would be greater than six years. Position 2 also suggested conditions of extreme hardship for consideration in extending the inspection interval beyond once every 6 years. In Position 2 the staff, in part, stated "[i]n order to support extension of the valve disassembly and inspection interval to longer than once every 6 years, the licensee should develop the following information: "a. Disassemble and inspect each valve in the grouping and document in detail the condition of each valve and the valve's capability to be full stroked. . . ."

Although GL 89-04 suggested information to be considered by the licensee in developing justification for an interval extension it was not all inclusive. The staff expected the licensee would conduct an in-depth review of all the safety effects as discussed during the public meetings. The staff expectations for justification of an interval extension were amplified in the responses to questions during the GL 89-04 public meetings. Included in the staff justification expectations was a licensee's detailed evaluation of the effects on public safety, the maintenance history, service history, and other information relative to valve reliability and that the review and evaluation would rely on known and recorded valve condition of each valve from previous inspection data rather than subjective qualitative judgement. In addition to the justification to comply with GL 89-04, Position 2, for the extreme hardship of performing D&I each refueling outage, the licensee is encouraged to consider the advantages of other test methods available, including

nonintrusive techniques, to reduce exposure and avoid the potential loss of decay heat removal. The justification for extending the interval is subject to NRC inspection.

#### 4.0 RELIEF REQUEST VR-28 AND ANOMALY 5.15

In addressing the use of installed flow elements or non-intrusive techniques for testing the applicable valves, the licensee may consider the use of non-intrusive techniques to periodically verify that the flow during the quarterly tests is adequate to full-stroke the valves. This approach would allow credit for the quarterly test and could eliminate the need to perform the flow test during refueling outages. The relief request meets the requirements of OM-10 for deferral of testing and, as stated in the TER, could be approved per 10 CFR 50.55a(f)(4)(iv). However, it is not clear that the licensee needs relief, and therefore, the request has been identified as an open item for the licensee to comment on the installed flow instruments shown on the system piping and instrument diagram, which would also be a means of meeting the test requirements during current quarterly pump testing. The current testing should be reviewed and if the licensee determines relief is required, the relief request should be revised to more clearly state the basis and the proposed alternative. The actions taken should be described in the licensee's response to Anomaly 5.15.

#### 5.0 CONCLUSION

The licensee's IST program requests for relief from the requirements of Section XI have been reviewed by the staff with the assistance of its contractor, Brookhaven National Laboratory (BNL). The Technical Evaluation Report (TER) provided as Attachment 1 is BNL's evaluation of the licensee's IST program relief requests. The staff has reviewed the TER and concurs with the evaluations and recommendations for granting relief or authorizing alternatives. A summary of the relief request determinations is presented in Table 1. The authorizing of alternatives or granting of relief is based upon the fulfillment of any commitments made by the licensee in its basis for each relief request and the alternatives proposed. Implementation of the IST program is subject to inspection by NRC.

Relief requests which are in accordance with the 1989 Edition of ASME Section XI (which incorporated OM-6 and OM-10) have been approved pursuant to 10 CFR 50.55a ¶ (f)(4)(iv) as listed in Table 1; however, because these meet the Code requirements, these are listed as "relief is not required." Certain other relief requests are authorized for an interim period to provide the licensee a period of time to review the testing and address long-term actions. Section 4 of the TER provides BNL's evaluation of valve testing deferral justifications with anomalies identified in Section 5.16 of the TER.

For any relief granted pursuant to GL 89-04, the staff, with technical assistance from BNL, has reviewed the information submitted by the licensee to determine whether the proposed alternative follows the relevant position in the GL. If an alternative conforms to a position of the GL, it is listed as

having been approved pursuant to GL 89-04 in Table 1 of the SE. Any anomalies in the relief request are addressed in the TER. .

The licensee should refer to the TER, Section 5, for a discussion of IST program anomalies identified during the review. The licensee should review and address, as necessary, all items in accordance with the guidance therein. The IST program relief requests are acceptable for implementation provided the action items identified in Section 5 of the TER are addressed within one year of the date of this SE or by the end of the next refueling outage, whichever is later, including the interim relief requests approved in the August 23, 1993, SE. The licensee should respond to the NRC within one year of the date of this SE describing actions taken, actions in progress, or actions to be taken, to address each of these items.

The staff concludes that the relief requests as evaluated and modified by this SE will provide reasonable assurance of the operational readiness of the pumps and valves to perform their safety-related functions. The staff has determined that granting relief pursuant to 10 CFR 50.55a (f)(6)(i), authorizing alternatives pursuant to 10 CFR 50.55a (a)(3)(i) and (a)(3)(ii), and approving alternatives pursuant to 10 CFR 50.55a (f)(4)(iv) is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest. In making this determination, the staff has considered the impracticality of performing the required testing and the burden on the licensee if the requirements were imposed.

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St. Lucie Unit 2- SE Table 1 - Summary of Relief Requests

Relief Request No.	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
PR-1	2.1.1	IWP-3300, 4310, Measurement of pump bearing temperature	All pumps	None.	Relief not required per §50.55a 1(f)(4)(iv).
PR-2	2.1.2	IWP-4120, Instrument range	Various pumps	Use portable instruments with reading accuracy of 2% for speed.	Authorized in accordance with §50.55a 1(a)(3)(i), with provisions.
PR-3		Request withdrawn			
PR-4		IWP-3100, Measurement of flowrate quarterly	Auxiliary Feedwater Pumps	Measure $\Delta P$ and vibration quarterly, measure flowrate, $\Delta P$ and vibration at cold shutdowns.	Granted in accordance with Generic Letter 89-04, Position 9.
PR-5		IWP-3100, Measurement of flowrate quarterly	Boric Acid Makeup Pumps	Measure $\Delta P$ and vibration quarterly, measure flowrate, $\Delta P$ and vibration at refueling outages.	Granted in accordance with Generic Letter 89-04, Position 9.
PR-6		IWP-3100, Measurement of flowrate quarterly	Containment Spray Pumps	Measure $\Delta P$ and vibration quarterly, measure flowrate, $\Delta P$ and vibration at refueling outages.	Granted in accordance with Generic Letter 89-04, Position 9.
PR-7		Request withdrawn			
PR-8	2.2.1	IWP-3100, measurement of suction and differential pressure.	Boric Acid Makeup Pumps	Calculate pump inlet and differential pressure based on tank level.	Authorized in accordance with §50.55a 1(a)(3)(i), with provisions.
PR-9		IWP-3100, Measurement of flowrate quarterly	High Pressure Safety Injection Pumps	Measure $\Delta P$ and vibration quarterly, measure flowrate, $\Delta P$ and vibration at refueling outages.	Granted in accordance with Generic Letter 89-04, Position 9.
PR-10		IWP-3100, Measurement of flowrate quarterly	Low Pressure Safety Injection Pumps	Measure $\Delta P$ and vibration quarterly, measure flowrate, $\Delta P$ and vibration at cold shutdowns.	Granted in accordance with Generic Letter 89-04, Position 9.
PR-11	2.3.1	IWP-3100, Measurement of suction and $\Delta P$ .	Intake Cooling Water Pumps	Calculate pump inlet and differential pressure based on intake structure level.	Authorized in accordance with §50.55a 1(a)(3)(i), with provisions.
PR-12	2.2.2	IWP-4520(b), Vibration instrument frequency response range.	Charging Pumps	Use instruments with lower frequency response of 10 Hz.	Interim relief granted in accordance with §50.55a 1(f)(6)(i) in 8/23/93 SE.

St. Lucie Unit 2-SE Table 1-Summary of Relief Requests (Continued)

Relief Request No.	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
PR-13	2.3.2	IWP-4520(b), Vibration instrument frequency response range.	Intake Cooling Water Pumps	Use instruments with lower frequency response of 10 Hz.	Interim relief granted in accordance with §50.55a ¶(f)(6)(i) in 8/23/93 SE.
PR-14	2.4.2	IWP-4520(b), Vibration instrument frequency response range.	CS Hydrazine Pumps	Use instruments with lower frequency response of 10 Hz.	Interim relief granted in accordance with §50.55a ¶(f)(6)(i) in 8/23/93 SE.
PR-15	2.4.1	IWP-3100, Measurement of suction and ΔP.	Containment Spray and Safety Injection Pumps	Calculate pump inlet and differential pressure based on tank level.	Authorized in accordance with §50.55a ¶(a)(3)(i), with provisions.
PR-16		Request withdrawn			
PR-17	2.4.3	IWP-3200, 3300, 4150, Measurement of flowrate quarterly and associated corrective actions.	CS Hydrazine Pumps	Measure vibration only quarterly, and flowrate and vibration at refueling outages.	Interim relief granted, with provisions, in accordance with §50.55a ¶(f)(6)(i) in 8/23/93 SE.
VR-1	3.1.1	IWV-3412, 4315, 3522, exercise all cold shutdown frequency valves each cold shutdown.	All cold shutdown valves	Test in accordance with OMA-1988, Part 10, ¶4.2.1.2 and 4.3.2.2.	Relief not required per §50.55a ¶(f)(4)(iv).
VR-2	3.2.1	IWV-3427(b), valve acceptance criteria for valves greater than 6 NPS.	V-3217, 3227, 3237, 3247, 3258, 3259, 3260, 3261, 3215, 3225, 3235, 3245, 3524, 3525, 3526, 3527, Safety injection pressure isolation valves	Use requirements in Technical Specification for PIVs	Relief not required per §50.55a ¶(f)(4)(iv).
VR-3		IWV-3417(a), Acceptance criteria.	Fast-acting Power-Operated Valves	Establish a maximum limiting stroke time of 2 seconds.	Relief granted in accordance with Generic Letter 89-04, Position 6.
VR-4	3.3.1	IWV-3426 and 3427, Measurement of individual valves' seat leakage.	Various CIVs	Leak test groups of valves.	Relief not required per §50.55a ¶(f)(4)(iv).
VR-5	3.6.1	IWV-3520, test frequency	V-2177, 2190, 2191, 2526, Boric acid makeup pumps to charging pump suction check valves	Partial-stroke exercise at cold shutdowns and full-stroke exercise at refueling outages.	Relief not required per §50.55a ¶(f)(4)(iv), provided all related requirements are met.



St. Lucie Unit 2-SE Table 1-Summary of Relief Requests (Continued)

Relief Request No.	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VR-6	3.6.2	IWV-3520, test frequency	V-2443, 2444, Boric acid makeup pumps to emergency boration header check valves	Partial-stroke exercise quarterly and full-stroke exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-7	3.6.3	IWV-3520, test frequency	V-07000, 07001, RWT to LPSI pump suction check valves	Partial-stroke exercise quarterly and full-stroke exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-8	3.6.4	IWV-3520, test frequency	V-3401, 3410, HPSI pump suction check valves	Partial-stroke exercise quarterly and full-stroke exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-9	3.6.5	IWV-3520, test frequency	V-3414, 3427, HPSI pump discharge check valves	Partial-stroke exercise when SIT are filled and full-stroke exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-10	3.6.6	IWV-3520, test frequency	V-3522, 3547, HPSI pump discharge check valves	Full-stroke exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-11	3.6.7	IWV-3520, test frequency	V-3113, 3133, 3143, 3766, HPSI header to RCS check valves	Partial-stroke exercise when SIT are filled and full-stroke exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-12	3.6.8	IWV-3520, test frequency	V-3524, 3535, 3526, 3527, SI hot leg injection check valves	Full-stroke exercise open at refueling outages. Exercise closed per Technical Specification on PIVs.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.

St. Lucie Unit 2-SE Table 1-Summary of Relief Requests (Continued)

Relief Request No.	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VR-13	3.2.2	IWV-3520, test frequency	V-3215, 3225, 3235, 3245, SIT to SI header check valves	Disassemble and inspect each valve once every 10 years. Exercise closed per Technical Specification on PIVs.	Relief from exercising open granted in accordance with Generic Letter 89-04, Position 1 or 2 with provisions. Relief from exercising closed not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-14	3.2.3	IWV-3520, test frequency	V-3217, 3227, 3237, 3247, Safety Injection header to RCS check valves	Partial-stroke exercise at cold shutdowns and refueling outages. Disassemble and inspect each valve once every 10 years. Exercise closed at cold shutdowns per Technical Specification on PIVs.	Relief from exercising open granted in accordance with Generic Letter 89-04, Position 1 or 2, with provisions. Relief from exercising closed not required.
VR-15	3.6.9	IWV-3520, test frequency	V-3258, 3259, 3260, 3261, Safety Injection header to RCS check valves	Partial-stroke exercised open and exercised closed when SIT are filled and full-stroke exercise open at cold shutdowns. Exercise closed per Technical Specification on PIVs.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-16		IWV-3427(b), valve acceptance criteria for valves greater than 6 nps.	CIVs greater than 6 nps.	Test in accordance with IWV-3426 and 3427(a).	Relief granted in accordance with Generic Letter 89-04, Position 10.
VR-17		Request withdrawn			
VR-18	3.6.10	IWV-3520, test frequency	V-15328, Makeup water supply CIV	Verify valve closure every 2 years in accordance with Appendix J.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-19	3.6.11	IWV-3520, test frequency	V-18195, Instrument air CIV	Verify valve closure capability every 2 years by §50 App. J leak test.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.

St. Lucie Unit 2-SE Table 1-Summary of Relief Requests (Continued)

Relief Request No.	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VR-20		IWV-3520, test frequency	V-07119, 07120, RWT to CS and SI suction headers check valves	Partial-stroke exercise quarterly. Disassemble and inspect one valve each refueling outage.	Relief granted in accordance with Generic Letter 89-04, Position 2.
VR-21	3.6.12	IWV-3520, test frequency	V-07129, 07143 containment spray pump discharge check valves	Partial-stroke exercise quarterly. Full-stroke exercise each refueling outage.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-22		IWV-3520, test frequency	V-07172, 07174, containment sump check valves	Disassemble and inspect one valve each refueling outage.	Relief granted in accordance with Generic Letter 89-04, Position 2.
VR-23		IWV-3520, test frequency	V-07192, 07193, containment spray header check valves	Disassemble and inspect one valve each refueling outage.	Relief granted in accordance with Generic Letter 89-04, Position 2.
VR-24	3.6.13	IWV-3520, test frequency	V-07256, 07258, Hydrazine pumps to CS pump suction check valves	Full-stroke test at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-25		Request withdrawn			
VR-26		Request withdrawn			
VR-27		IWV-3520, test frequency	V-9303, 9304, 9305, AFW min. flow check valves	Partial-stroke exercise quarterly. Disassemble and inspect one valve each refueling outage.	Relief granted in accordance with Generic Letter 89-04, Position 2.
VR-28	3.6.14	IWV-3520, test frequency	V-3104, 3105, LPSI min. flow check valves	Partial-stroke exercise open quarterly. Back flow test at cold shutdowns. Full-stroke exercise at refueling outages.	Open item.
VR-29	3.2.4	IWV-3427(b), valve acceptance criteria for valves greater than 6 nps.	V-3480, 3481, 3651, 3652, SI PIVs.	Verify valve closure capability in accordance with Technical Specification on PIVs.	Relief not required per §50.55a 1(f)(4)(iv).
VR-30		IWV-3520, test frequency	V-3102, 3103, HPSI min. flow check valves.	Partial-stroke exercise open quarterly. Back flow test at cold shutdowns. Disassemble and inspect one valve each refueling outage.	Relief granted in accordance with Generic Letter 89-04, Position 2.

St. Lucie Unit 2-SE Table 1-Summary of Relief Requests (Continued)

Relief Request No.	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VR-31		IWV-3520, test frequency	V-08130, 08163, Steam supply to AFW turbine	Partial-stroke exercise monthly. Full-stroke exercise during refueling outages. Disassemble and inspect one valve each refueling outage.	Relief granted in accordance with Generic Letter 89-04, Position 2.
VR-32	3.6.15	IWV-3520, test frequency	V-3101, SITs to VCT check valve	Partial-stroke exercise during cold shutdowns. Full-flow exercise at refueling outages.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-33	3.4.1	IWV-3414(a), POVs acceptance criteria	SE-09-2, 3, 4, 5, FW solenoid valves	Valves will not be "trended for alert testing" quarterly. Valves will be declared inoperative if stroke times exceed the maximum allowed stroke time. During cold shutdowns, if a valve exceeds its alert limit, it will be addressed prior to startup.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.
VR-34	3.5.1	IWV-3414(a), POVs acceptance criteria	TCV-14-4A and B, Intake cooling water to CCW HX temperature control valves.	Valves will not be "trended for alert testing" quarterly. Valves will be declared inoperative if stroke times exceed the maximum allowed stroke time.	Relief not required per §50.55a 1(f)(4)(iv), provided all related requirements are met.