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SUBJECT: Requests that Relief Requests VR-8,VR-9 & PR-9 of IST program for pumps & valves 1990-1991 Third 10-yr Interval, Rev 2 QA Manual App C be revised.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

January 12, 1996

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Revision of Relief Requests VR-8, VR-9, and PR-9 of Inservice Testing (IST) Program for Pumps and Valves 1990-1999 Third 10-Year Interval, Revision 2
Quality Assurance Manual Appendix C
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

The purpose of this letter is to request revision of three previously approved relief requests. The request for revision results from IST Program test method and program improvements.

Relief Request revisions to VR-8 (Attachment 1) and VR-9 (Attachment 2) address performing full flow testing of the safety injection accumulator discharge check valves vice the current relief requests' valve disassembly inspection.

Relief Request revision to PR-9 (Attachment 3) addresses performance testing of positive displacement charging pumps to establish more realistic flow rate tolerances.

Very truly yours,

Robert C. Mecredy

REJ\415

xc: Mr. Allen R. Johnson (Mail Stop 14B2)
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Attachment 1

RELIEF REQUEST NO. VR - 8, Rev. 1

SYSTEM:	Safety Injection
VALVES:	842A, 842B
CATEGORY:	A/C
SAFETY CLASS:	1
FUNCTION:	These valves open to provide flow from the safety injection (SI) accumulators to the reactor coolant system (RCS).
TEST REQUIREMENT:	Check valves shall be exercised at least once every three months except as provided by IWV-3522. (IWV-3521) If only limited operation is practical, during plant operation the check valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns. (IWV-3522) The previous relief request VR-8 provided for valve disassembly once every six years as the alternative position. (Relief Request No. VR-8)
BASIS FOR RELIEF:	Full-stroke open and close exercising during normal power operation cannot be accomplished since system pressures required to perform the test are not enough to overcome RCS pressure. A test method that permits and confirms full-stroke exercising of these check valves during cold shutdown has been developed for Ginna Station. To perform the test, the plant must be maintained in an off-normal condition with a risk for nitrogen injection and possible entrainment in the RCS. The performance of this test also involves added personnel radiological exposure. Additionally, this test method requires extensive planning and setup and substantially impacts refueling outage schedule at the start of the shutdown. As a result of the implementation of this check valve test method, the need for periodic disassembly to satisfy Code requirements would no longer exist thereby eliminating the potential for improper reassembly. The maintenance history of these check valves documents that the valves have been found in excellent mechanical condition

upon disassembly. With an excellent mechanical condition baseline verified by periodic part-stroke (quarterly) and full-stroke testing, the operability of check valves 842A and 842B will continue to be ensured.

ALTERNATE TESTING: These valves will be part-stroke exercised quarterly using the SI test header.

Full-stroke exercising of 842A and 842B will be performed in conjunction with full-stroke exercising of 867A and 867B at a frequency of once every three refueling outages.

Attachment 2

RELIEF REQUEST NO. VR - 9, Rev. 1

SYSTEM: Safety Injection

VALVES: 867A, 867B

CATEGORY: A/C

SAFETY CLASS: 1

FUNCTION: These valves open to provide a flowpath from the safety injection (SI) accumulators or the SI pumps to the reactor coolant system (RCS) cold legs.

TEST REQUIREMENT: Check valves shall be exercised at least once every three months except as provided by IWV-3522. (IWV-3521)

If only limited operation is practical, during plant operation the check valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns. (IWV-3522)

The previous relief request VR-9 provided for valve disassembly once every six years as the alternative position (Relief Request No. VR-9)

BASIS FOR RELIEF: Full-stroke or part-stroke open and close exercising during normal power operation cannot be accomplished since system pressures required to perform the test are not enough to overcome RCS pressure. A test method that permits and confirms full- stroke exercising of these check valves during cold shutdown has been developed for Ginna Station. To perform the test, the plant must be maintained in an off-normal condition with a risk for nitrogen injection and possible entrainment in the RCS. The performance of this test also involves added personnel radiological exposure. Additionally, this test method requires extensive planning and setup and substantially impacts refueling outage schedule at the start of the shutdown.

As a result of the implementation of this check valve test method, the need for periodic disassembly to satisfy Code requirements would no longer exist thereby eliminating the potential for improper reassembly. The maintenance history of these

check valves documents that these valves are found in excellent mechanical condition upon disassembly. With an excellent mechanical condition baseline verified by periodic part-stroke and full-stroke testing, the operability of check valves 867A and 867B will continue to be ensured.

ALTERNATE TESTING: These valves will be part-stroke exercised each refueling outage using actual SI flow into the RCS.

Full-stroke exercising of 867A and 867B will be performed in conjunction with full-stroke exercising of 842A and 842B at a frequency of once every three refueling outages.

Attachment 3

RELIEF REQUEST NO. PR-9, Rev. 1

SYSTEM:	CVCS Charging
PUMPS:	Charging Pumps A, B & C (PCH01A, 1B, 1C)
SAFETY CLASS:	2
FUNCTION:	The charging pumps function to control RCS inventory, chemistry conditions, activity level, boron concentration and to provide seal water to the RCPs.
TEST REQUIREMENT:	(1) The resistance of the system shall be varied until either the measured differential pressure or the measured flow rate equals the corresponding reference value. (IWP-3100) (2) The test quantities shown in Table IWP-3100-1 (inlet and differential pressure in particular) shall be measured or observed and recorded. (IWP-3100) (3) The allowable ranges of inservice test quantities in relation to reference values (flow rate in particular) are tabulated in Table IWP-3100-2. (IWP-3210) (4) Pump discharge pressure shall be measured in lieu of pump differential per OM_a-1988, Part 6 Table 2. (Relief Request PR-9)
BASIS FOR RELIEF:	The charging pumps are variable-speed positive-displacement type pumps. (1) The test method developed for these pumps involves attaining the reference baseline speed (N) and the measurement of flow rate (Q), discharge pressure (P_D), vibration (V) and oil level (L). Since the resistance of the system is fixed by RCP seal and letdown flow, it would cause an unnecessary perturbation upon Pressurizer level control to vary the charging flow rate to the RCS. The establishment of the reference speed and the verification of acceptable flow rate has been proven to provide an accurate and repeatable indication of pump/varidrive performance degradation.

(2) The measurement of pump inlet (suction) pressure provides no useful data for evaluation of pump performance or for detecting pump degradation and since pump discharge pressure is dependent upon RCS pressure, the recording of pump differential pressure for positive-displacement type pumps is not applicable.

(3) Operation of the charging pumps and the identification of excessive pump leakage is continuously monitored. Periodic testing using the allowable ranges of Table IWP-3100-2 often results in the identification of insignificant deviations that do not affect charging pump operability. These pumps are subject to performance differences resulting from varidrive air controller drift, varidrive drive belt slippage, pump plunger leakage, discharge relief valve leakage and flow instrument calibration drift. Since the minimum operability limit for these pumps is 15 gpm to ensure safety-function performance (boron addition to compensate for Xenon decay), performance deviations that exceed the Alert and Required Action ranges of Table IWP-3100-2 result in unnecessary corrective actions per IWP-3230. Upon loss of instrument air, the charging pumps revert to minimum speed which, by design, will deliver a minimum of 15 gpm per pump. The establishment of a reference flow rate of 37.5 gpm, ± 10 gpm, per pump ensures the safety-function flow rate is always attainable. Since the charging pumps are continuously monitored and verified to be delivering greater than 15 gpm when in service, no Alert Range values will be established.

ALTERNATE TESTING: (1) In lieu of varying the resistance of the system until the differential pressure or flow rate equals the corresponding reference value, the speed of the pump will be adjusted to the corresponding reference value.

(2) Pump discharge pressure shall be measured in lieu of pump inlet and differential pressures per OM_a-1988, Part 6 Table 2.

(3) The reference flow rate to be verified at the reference speed shall be 37.5 gpm, ± 10 gpm. No Alert Range values will be designated. The minimum operability limit will be designated as 15 gpm per R.E. Ginna Nuclear Power Plant Technical Specifications.