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FACIL:50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
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LOFLIN,L.I. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Provides revised relief requests for inservice testing program.

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TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES:Application for permit renewal filed. 05000400

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JUN 6 1988

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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
IN-SERVICE PUMP AND VALVE TESTING PROGRAM

Gentlemen:

Carolina Power & Light Company (CP&L) hereby submits for your review revised relief requests for the Shearon Harris Nuclear Power Plant In-service Testing (IST) Program. The original relief request submitted for Auxiliary Feedwater discharge check valves was denied by NRC safety evaluation (SE) dated April 27, 1988 on the basis that the proposed testing did not provide reasonable assurance of individual valve closure.

The revised relief requests identify the proposed alternative method of testing as discussed with the NRC staff and its contractor on May 19, 1988. Your review and approval of the revised requests is requested by September 1, 1988 to support Cycle 2 operations.

CP&L has reviewed the SE and agrees with the evaluations and conclusions contained in the Technical Evaluation Report (TER) with one exception. Appendix C, item 1, last sentence suggests that the licensee make modifications to the program and submit them to the NRC for review. We agree with program modifications where compliance to requirements is impractical, but disagree that they need to be submitted to the NRC unless they involve denied relief. Resolution of the outstanding relief requests will complete the initial licensing process for the first ten-year interval of the IST program. The conclusion of the SE and Table 1 support this position.

If you have any questions on this subject, please contact Mr. D. B. Bates at (919) 836-6154.

Yours very truly,

L. I. Loflin
Manager
Nuclear Licensing Section

DBB/dml (5421JDK)

cc: Mr. B. C. Buckley
Dr. J. Nelson Grace
Mr. G. F. Maxwell

A047
1/1

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

# VALVE

# RELIEF REQUEST

# RV-2

| | |
|---|---|
| System: | Auxiliary Feedwater |
| Valve: | 1AF-117 |
| Category: | C |
| Class: | 3 |
| Function: | 1C-SAB Discharge Check Valve |
| Test Requirements: | Verify reverse flow closure. |
| Basis for Relief: | The system has no design provision for verification of reverse flow closure. The only possible test method involves pressurizing the downstream section of pipe and monitoring an upstream tap for evidence of gross leakage. This method involves filling and draining large segments of the system. Because of the time involved, ALARA consideration, and large amounts of wastes, it is not practical to perform testing except at refueling. The only other alternative testing is to disassemble and visually inspect the valve. |
| Alternate Testing: | 1AF-117 will be disassembled and visually inspected at each refueling to assure full closed position. |

(5421JDK/dml)

VALVE

RELIEF REQUEST

RV-3

| | |
|---|---|
| System: | Auxiliary Feedwater |
| Valve: | 1AF-201, 202, 203<br>204, 205, 206 |
| Category: | C |
| Class: | 3 |
| Function: | Auxiliary Feedwater Pump Discharge Line to Feedwater Line Check Valves. |
| Test Requirement: | Verify reverse flow closure. |
| Basis for Relief: | The system has no design provision for verification of reverse flow closure. The only possible test method involves pressurizing the downstream section of pipe and monitoring on upstream tap for evidence of gross leakage. This method involves filling and draining large segments of the system. Because of the time involved, ALARA consideration, and large amounts of wastes, it is not practical to perform testing except at refueling. The only other alternative testing is to disassemble and visually inspect each valve. |
| Alternate Testing: | During normal plant operation, the Valves 1AF-201, 202, 203, 204, 205, and 206 will be verified to be in the closed position through the continual monitoring of installed temperature elements. Unacceptable conditions require action in accordance with Plant Operating Procedures. In addition, one valve off of the Motor-Driven Train and one valve off Turbine-Driven Train will be disassembled and inspected at each refueling, and alternate valves will be done during subsequent refuelings. Failure to pass inspection will initiate disassembly and inspection of the other valves on the same train. |

(5421JDK/dml)