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RECIP.NAME RECIPIENT AFFILIATION
YOUNGBLOOD,B.J. Licensing Branch 1

SUBJECT: Submits info in response to NRC concerns on leaktight integrity of primary coolant sys pressure isolation valves. Leak testing will be performed every 18 months & limiting conditions for operation incorporated into Tech Specs.

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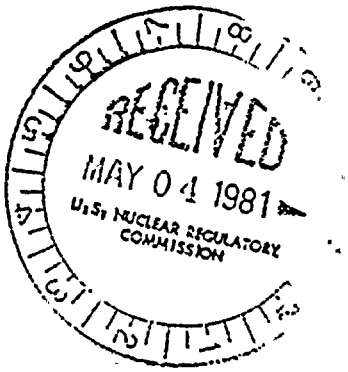
Docket Nos. 50-387
50-388

NORMAN W. CURTIS
Vice President-Engineering & Construction-Nuclear
770-5381

April 28, 1981



Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
LEAKTIGHT INTEGRITY OF PRIMARY COOLANT SYSTEM
PRESSURE ISOLATION VALVES
ER 100450 FILE 841-2
PLA-748

Dear Mr. Youngblood:

The following is in response to a concern which was expressed at a meeting between PP&L and the NRC-Mechanical Engineering Branch.

NRC Position

1. A minimum of 2 valve isolations are required between RCS and low pressure systems. The Class 1 to Class 2 boundary is considered the isolation point.
2. A water leak test will be performed on 2 of the pressure isolation valves at each interface utilizing system operating Δp with an acceptance criterion of 1 gpm per valve.
3. Leak test frequency will be once per refueling outage, prior to return to service following valve maintenance, and following each time the valve is cycled.
4. Technical Specifications will provide LCO/Surveillance for those pressure isolation valves which will also be categorized as A or AC in the pump and valve ISI program.

PL Position

1. The following high/low pressure interfaces are within the scope of the NRC requirements:

1ST ISOLATION VALVE(S) NUMBER(S)	TYPE	2ND ISOLATION VALVE(S) NUMBER(S)	TYPE	SERVICE
HV-1F006A HV-1F037A	Check Globe	HV-1F005A	Gate	Core Spray Injection
HV-1F006B HV-1F037B	Check Globe	HV-1F005B	Gate	Core Spray Injection

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HV-1F050A HV-1F122A	Check Globe	HV-1F015A	Gate	LPCI Injection
HV-1F050B HV-1F122B	Check Globe	HV-1F015B	Gate	LPCI Injection
HV-1F-22	Gate	HV-1F033	Globe	Head Spray
HV-1F009	Gate	HV-1F008	Gate	Shutdown Cooling

2. Leak testing will be provided for pressure isolation valves at a frequency of once per 18 months, and prior to returning to service following valve maintenance that could affect valve leak tightness. This will be a water test with acceptance criteria of 1 gpm for a test Δp equal to reactor operating pressure. An alternative to this water test is adoption of a leakage limit for each valve undergoing Type C testing (10 CFR 50, Appendix J) which provides assurance that the 1 gpm water leakage criteria is met.

3. Frequency of Testing

   Leakage testing will be performed at a convenient point once per 18 months and following maintenance which could affect valve leak tightness. No commitment is made to testing immediately prior to entering OPERATIONAL CONDITION 2 on startup or to testing following valve actuation; alternative means of assuring valve position are utilized. Where available, direct indication of valve position will assure that the pressure isolation function is being provided. For valves where no direct position indication exists, plant startups will be initiated with the other pressure isolation valves open. Plant pressurization will connect and the other valves (with direct position indication) will not be closed until pressure isolation of the first valve is verified by pressure instrumentation readings.

4. Pressure Isolation Valve Limiting Conditions for Operation and Surveillance testing requirements will be incorporated into the Technical Specifications. These valves will be categorized A or AC as appropriate in the Pump and Valve ISI Program.

Very truly yours,

N. W. Curtis
Vice President-Engineering and Construction-Nuclear

RRS:mcb