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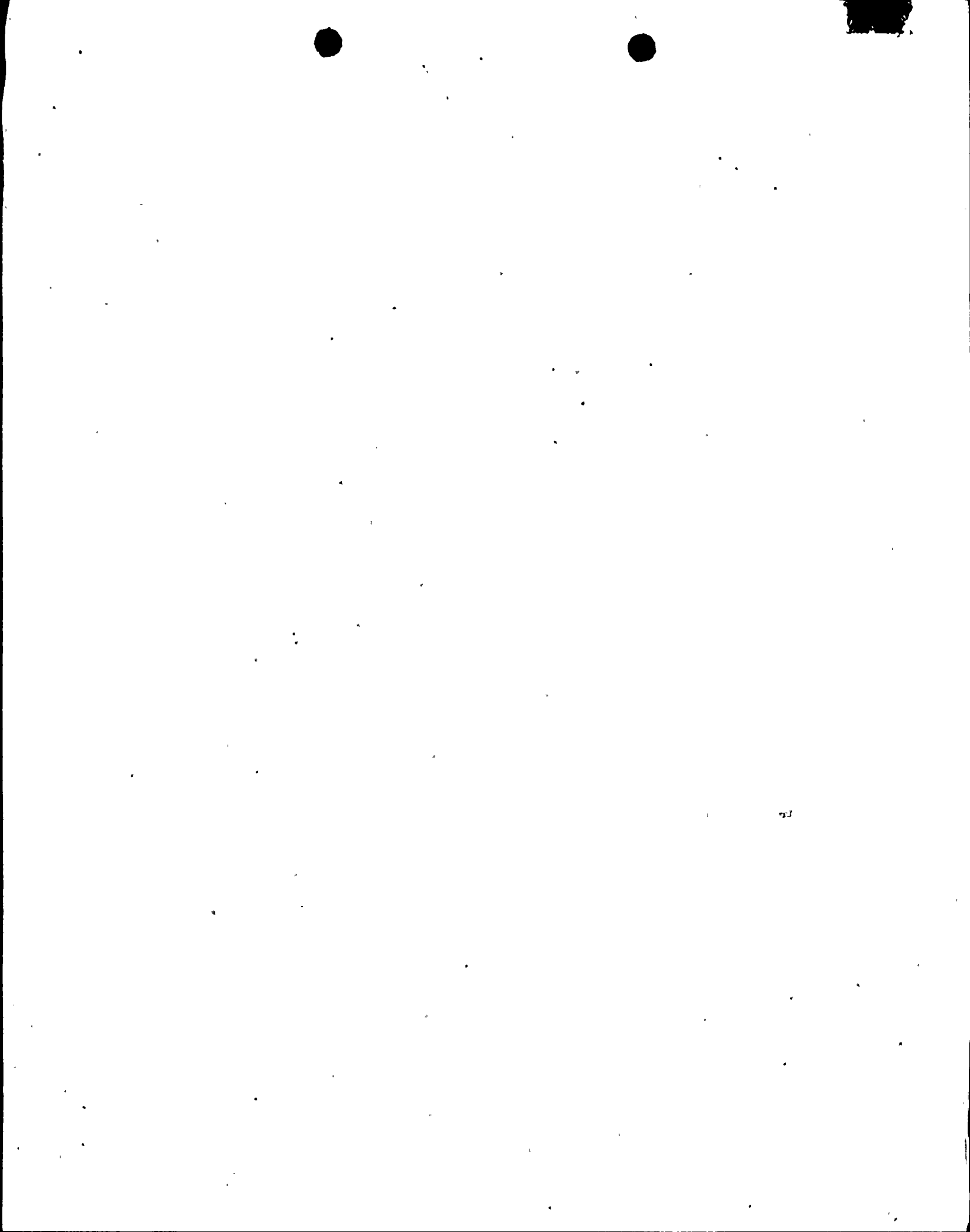
SUBJECT: Informs of completion of technical evaluation of excess flow check valves, sensing lines & valve testability requirements. Lines tested per ASME Section III Class 2. Valves open to containment or suppression pool listed.

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Pennsylvania Power & Light Company

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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
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March 16, 1982



Mr. A. Schwencer, Chief
Licensing Branch No. 2
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos. 50-387
50-388

**SUSQUEHANNA STEAM ELECTRIC STATION
EXCESS FLOW CHECK VALVE TESTABILITY REQUIREMENTS
ER 100450 FILE 841-2
PLA-1036**

Dear Mr. Schwencer:

Pennsylvania Power and Light Company has conducted a technical evaluation of the excess flow check valves, their sensing lines, and the valve testability requirements. For the purpose of this evaluation, all of the sensing lines which penetrate the containment have been grouped into two general categories: Those lines which connect to specific processes and those that are open inside the containment to sense atmospheric pressure and suppression pool level.

Those processes which are sensed by instrument lines penetrating the primary containment operate at pressures which are in excess of the 3-10 psi that is required to close the excess flow check valves. In the event of a sensing line break, the differential pressure across a valve would vary with the location of the line break. As a consequence a test which generates a differential pressure across the valve may not be a true indication of whether or not the valve will close in the event of a line break. Therefore, for those instrument sensing lines which are connected to specific processes, it is our position that functional tests be performed on the valves. The test would consist of opening the drain or vent valve at the instrument with the system operating at or below normal pressure. This would generate the lowest practical differential pressure across the excess flow check valve. Other locations may be acceptable depending on process pressure.

*Boon
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Mr. A. Schwencer

For those instrument sensing lines which are open inside the primary containment, the normal operating pressure (0.1 to 1.5 psig) is below the limits set forth in the valve specification and the plant technical specification. As a consequence, our position is that the entire sensing line should be classified as an extension of the primary containment boundary. All sensing lines in this category have been purchased and installed in accordance with the requirements of ASME Section III Class 2. ASME Section III Class 2 manual isolation valves have been installed at the containment penetrations and at the respective instrument or panel connections. The qualification of the instruments and panels is addressed by the Susquehanna SES dynamic and environmental qualification programs. Since these sensing lines qualify as extensions of the primary containment boundary whether or not the excess flow check valves are in the lines, it is our intent that these valves remain in their respective sensing lines. No credit should be taken for the valves closing, nor should the valves be included in the functional test. A table of those valves is attached.

We will submit a change to the appropriate section of the Technical Specifications.

If you have any questions, please contact us.

Very truly yours,



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

CTC/mks

Attachment

cc: R. Perch - NRC

TABLE I

Excess Flow Check Valves in Sensing lines which are open to primary containment atmosphere or suppression pool.

XV-15110A

XV-15110B

XV-15110C

XV-15110D

XV-15516

XV-15517

XV-15701A

XV-15709A

XV-15709B

XV-15710A

XV-15710B

XV-15728A

XV-15728B

XV-15775A

XV-15775B

XV-15776

XV-15777

XV-15778A

XV-15778B



Handwritten scribbles and faint lines in the top left corner.

Handwritten scribbles in the upper left quadrant.

Small handwritten mark or character.

Small handwritten mark or character.