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

November 19, 1979

Docket No. 50-334

Mr. C. N. Dunn, Vice President
Operations Division
Duquesne Light Company
435 Sixth Avenue
Pittsburgh, Pennsylvania 15219

Dear Mr. Dunn:

Arrangements have been made with Mr. Jack Carey for a meeting at the Beaver Valley Unit No. 1 site on December 12 and 13, 1979 to discuss inservice testing of pumps and valves. In preparation for the meeting, the enclosed comments and questions have been developed indicating our need for additional information to complete our review of your proposed inspection program. It is requested that your responses to the enclosed comments and questions be available for the meeting.

Sincerely,

A. Schwencer

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosure:
Request for Additional
Information

cc: w/enclosure
See next page

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The following are comments and questions on the in-service testing submittals by Duquesne Light Co. These comments and questions are directed at Beaver Valley Unit 1 and are preparatory to a future working meeting to be arranged by the NRC with the licensee. NOTE: Section XI and Appendix J refer to the ASME code and 10 CFR 50 respectively.

VALVES

A. General Comments and Questions

1. Stroke timing of all category A and B power operated valves is important for trend analysis of valve degradation.

2. Section XI testing frequencies should be specified in terms of power operation, cold shutdowns and refueling outages rather than by mode numbers.

3. "Check valves that are containment isolations" must be exercised each three months unless specific technical justification is provided for each relief requested.

B. Reactor Coolant System

1. Provide the specific technical basis why valves 1RC455A and 1RC455B cannot be exercised during power operation.

2. What is the safety related function of valves 1RC455C, 1RC455D, and 1RC456?

3. What is the safety related function of the following valves 1RC556A, B, and C?

4. What is the safety related function of valves 1RC585, 1RC586, and 1RC587?

5. Provide the specific technical basis why valves 1RC68 and 1RC72 cannot be exercised quarterly.

6. Provide the specific technical basis why valves 1RC277 and 1RC278 cannot be exercised quarterly.

C. Chemical and Volume Control

1. Provide the specific technical basis why valves 1CH114A and B cannot be full stroke exercised during power operation.

2. What is the safety related function of valve 1CH115A?

3. Provide the specific technical basis why valves 1CH115C and 1CH115D cannot be exercised during power operation and cold shutdowns?

4. What is the safety related function of valve 1CH135? Is this a manual valve?

5. Provide the specific technical basis why valve 1CH142 cannot be exercised during power operation.

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6. What is the safety related function of valve 1CH145?

7. Valve 1CH220 is listed as a category B/E valve but should be category E only.

8. Provide the specific technical basis why valves 1CH308A, B and C cannot be exercised during power operation and cold shutdowns.

9. Provide the specific technical basis why valve 1CH311 cannot be exercised during power operation.

10. Provide the specific technical basis why valve 1CH350 cannot be exercised during power operation.

11. What is the safety related function of valve 1CH370?

12. Provide the specific technical basis why valves 1CH378 and 1CH381 cannot be exercised during power operation and cold shutdowns.

13. What is the safety related function of valve 1CH389?

14. Provide the specific technical basis why valves 1CH460A and 1CH460B cannot be exercised during power operation.

15. How is check valve 1CH31 verified to move to its safety related position during the monthly exercising test?

16. Provide the specific technical basis why valves 1CH181, 1CH182, 1CH183 and 1CH170 cannot be exercised to their safety related position during power operation and cold shutdowns. "Possible increase in seat leakage due to cycling" is not an acceptable technical basis.

17. How are check valves 1CH22, 1CH23 and 1CH24 full stroke exercised during power operation?

18. How is check valve 1CH141 full stroke exercised during power operation?

19. What is the safety related function of check valves 1CH152, 1CH153 and 1CH154?

20. Is valve 1CH369 leak tested per Section XI?

21. Review the safety related function of the following valves to determine if they should be included in the IST program:

    1CH19 (location F-3)
    1CH20 (location F-4)
    1CH21 (location F-5)

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1CH71 (location E-3)
1CH72 (location E-6)
1CH73 (location G-4)
1CH74 (location G-6)
1CH79 (location F-4)
1CH80 (location F-5)
1CH81 (location F-3)
1CH82 (location F-2)

D. Reactor Plant Vents and Drains

1. Provide the specific technical basis why stroke timing the power operated valves in this system cannot be performed during the quarterly exercising.

E. Residual Heat Removal

1. Provide the specific technical basis why all power operated valves in this system cannot be exercised during power operation and cold shutdowns.

2. Manual valve 1RH13 should be categorized E rather than B/E.

3. Review the safety related function of the RHR pump discharge check valves, 1RH3 and 1RH4, to determine if they should be included in the IST program and categorized C.

F. Safety Injection

1. Provide the specific technical basis why valves 1SI101-1 and 1SI101-2 cannot be exercised and stroke timed during power operation.

2. What is the exercising and stroke timing frequency for valve 1SI836?

3. What is the safety related function of valves 1SI851A, B, C and 1SI853 A, B and C?

4. Provide the specific technical basis why valves 1SI860A and B cannot be exercised and stroke timed during power operation and cold shutdowns.

5. Provide the specific technical basis why valves 1SI862A and B cannot be exercised and stroke timed during power operation and cold shutdowns?

6. Provide the specific technical basis why valves 1SI865A, B, and C cannot be exercised during power operation and cold shutdowns.

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7. Provide the specific technical basis why valves 1SI867A, B, and C cannot be exercised during power operation and cold shutdowns.

8. Provide the specific technical basis why valves 1SI869A and B cannot be exercised during power operation and cold shutdowns.

9. Provide the specific technical basis why valves 1SI884A, B, and C cannot be exercised during power operation and cold shutdowns.

10. Review the safety relted function of valves 1SI885 C and D to determine if they should be categorized B rather than A.

11. Provide the specific technical basis why valves 1SI890A, B, and C cannot be full stroke exercised during power operation and cold shutdown.

12. Are valves 1SI41 and 1SI91 locked or sealed shut?

13. The following check valves must be categorized A/C and exercised per Section XI or specific relief must be requested:

    1SI10
    1SI11
    1SI12
    1SI13
    1SI14
    1SI42
    1SI83
    1SI84
    1SI94
    1SI95

14. The category B/E manual valves listed should be listed as category E only.

15. Review the safety related function of the following valves to determine if they should be included in the IST program:

    1SI1 (location G-3)
    1SI2 (location G-5)
    1SI5 (location F-7)
    1SI6 (location F-3)
    1SI7 (location F-6)
    1SI26 (location E-7)
    1SI27 (location E-7)
    1SI30 (location F-7)
    1SI100 (location B-2)
    1SI101 (location B-2)

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1SI102 (location B-2)
1SI23 (location B-1)
1SI24 (location B-1)
1SI25 (location B-1)
1SI20 (location A-1)
1SI21 (location A-1)
1SI22 (location A-1)
1SI15 (location B-2)
1SI16 (location B-2)
1SI17 (location B-2)
1SI48 (location G-3)
1SI49 (location E-6)
1SI50 (location D-3)
1SI51 (location G-2)
1SI52 (location F-2)
1SI53 (location E-2)

G. Containment Vacuum

1. Provide the specific technical basis why valves 1CV35 and 1CV36 cannot be exercised per Section XI requirements.

2. Provide the specific technical basis why the following valves cannot be stroke timed during the quarterly exercising tests.

1CV101A
1CV101B
1CV102
1CV102-1
1CV150A
1CV150B
1CV150C
1CV150D
1LM100A1
1LM100A2
1LM101A
1LM101B

3. Specific relief must be requested from exercising manual category A valves 1CV151 and 1CV151-1.

H. Containment Depressurization

1. What is the safety related function of valve 1QS37, 1QS38, 1QS39, 1QS40, and 1QS41?

2. Are valves 1QS86, 1QS87, 1QS88, 1QS90, 1QS91 and 1QS92 locked or sealed in the open position?

3. Are valves 1RS155A and B leak tested in the direction specified by the code?

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4. Provide the specific technical basis why valves 1QS3, 1QS4, 1RS100 and 1RS101 cannot be full stroke exercised during power operation and cold shutdowns.

5. Review the safety related function of the following valves to determine if they should be included in the IST program:

   1QS9
   1QS10
   1RS157
   1RS159

I. Component Cooling

1. Provide the specific technical basis why valves 1CC100 (TCV) and 1CC100A cannot be exercised during power operation and cold shutdowns.

2. Each power operated valve must be exercised and stroke timed quarterly unless a specific technical basis can be provided why the valve cannot be exercised per Section XI.

3. What is the safety related function of valve 1CC111?

4. What is the exercising frequency for valves 1CC111A1, 1CC111A2, 1CC111D1, and 1CC111D2?

5. Is valve 1CC132-2 listed in IST program valve 1CC133-2 as listed on P&ID?

6. What is the NSA position for category E valves 1CC249 and 1CC250?

7. Review the safety related function of the following valves to determine if they should be included in the IST program:

Valves	Location	Figure Numbers
1CC1	F-6	15-1
1CC2	F-6	15-1
1CC3	F-7	15-1
1CC4	E-6	15-1
1CC5	E-6	15-1
1CC6	E-7	15-1
1CC7	E-6	15-1
1CC8	E-6	15-1
1CC9	E-7	15-1
1CC12	B-5	15-1
1CC13	C-5	15-1
1CC14	D-5	15-1
1CC15	B-6	15-1

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1CC16	C-5	15-1
1CC17	D-6	15-1
1CC18	B-7	15-1
1CC39	B-7	15-1
1CC353	A-2	29-2

J. Gaseous Waste System

1. Provide the P&ID that includes the valves listed in the IST program for our review at the working meeting.

2. All valves not tested per Section XI will require a relief request giving specific technical information justifying that relief request.

K. Main Steam

1. What is the full stroke exercising frequency for valves 1MS101A, B and C (TV's)?

2. Review the safety related function of the following valves to determine if they should be included in the IST program:

   1MS18 (location F-4)
   1MS19 (location G-4)
   1MS20 (location G-4)
   1MS26 (location D-3)
   1MS80 (location C-3)
   1MS81 (location D-3)
   1MS82 (location E-3)

3. Provide P&ID RM137A at the working meeting for the completion of our review of your IST program.

L. Feedwater System

1. Are valves 1FW36 through 1FW41 locked or sealed in their normal position?

2. Provide the specific technical basis why valves 1FW156A, B and C cannot be exercised during power operation.

3. What is the safety related function of valves 1FW478, 1FW479, 1FW488, 1FW489, 1FW498 and 1FW499?

4. Provide the specific technical basis why the following check valves cannot be full stroke exercised during power operation and cold shutdowns.

   1FW33
   1FW34
   1FW35

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1FW42
1FW43
1FW44
1FW50
1FW51
1FW52
1FW68
1FW69
1FW70

5. What is the safety related function of check valve 1FW61?

6. Which valves in the auxiliary feed system control steam generator levels?

7. Review the safety related function of the following valves to determine if they should be included in the IST program:

1WT221 (location E-7)
1WT222 (location E-7)
1WT223 (location E-7)
1WT225 (location F-6)
1WT226 (location F-3)
1WT227 (location F-4)
1WT208 (location F-5)
1WT209 (location F-3)
1WT210 (location F-4)

M. Auxiliary Steam System

1. Provide the specific technical basis why valve 1AS278 cannot be full stroke exercised during power operation and cold shutdowns.

N. River Water System

1. Provide the specific technical basis why valves 1RW107A, B and C cannot be full stroke exercised during power operation and cold shutdown.

2. What is the safety related function of valve 1RW61?

3. Provide P&ID 1RM127C at the working meeting for the completion of our review of your IST program.

4. What is the safety related function of valves 1RW484 and 1RW485?

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5. Review the safety related function of the following valves to determine if they should be included in the IST program:

1RW114 (location F-3)
1RW115 (location G-3)
1RW193 (location D-3)
1RW194 (location D-3)
1RW195 (location E-3)
1RW196 (location F-3)
1RW197 (location D-1)
1RW198 (location D-1)
1RW200 (location A-1)

O. Fire Protection System

1. Review the safety related function of all valves in this system listed in the IST program to determine if they should be deleted from this program.

P. Compressed Air/Station Air Systems

1. Provide P&ID 1RM140A and RK-1D at the working meeting for the completion of our review of your IST program.

Q. 4 KV Electrical (Diesel Fuel and Air)

1. Review the safety related function of the following valves to determine if they should be included in the IST Program:

1FO1 (location G-2)
1FO2 (location F-2)
1FO11 (location G-4)
1FO12 (location G-4)
1FO13 (location G-4)
1FO14 (location E-4)
1FO28 (location F-5)
1FO29 (location F-7)
1DA102 (location A-2)
1DA103 (location A-4)
1DA132 (location A-7)
1DA133 (location A-9)

R. Control Area Ventilation

1. Provide P&ID 1RM140B and RB-2B at the working meeting for the completion of our review of your IST program.

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S. Post DBA H_2 Control

1. Provide the specific technical basis why the following valves cannot be full stroke exercised during power operation and cold shutdowns:

   1HY101
   1HY102
   1HY103
   1HY104
   1HY110
   1HY111
   1HY119
   1HY[illegible]

PUMPS

A. General Questions and Comments

1. Why must two charging pumps be running simultaneously during the monthly pump testing?

2. Expain the statement "Running pump on recirculation only did not work", on the Residual Heat Removal Pump test sheet.

3. Can the component cooling water pumps be run individually for the monthly pump tests?

4. How is flow rate (Q) measured on the River Water Pumps?

5. Provide the specific technical basis why inlet pressure (P_i) cannot be measured for the Diesel Fuel Transfer Pumps.

6. Provide a detailed explanation of how the proposed justification for differential pressure (dP) for the Diesel Fuel Transfer Pumps meets or exceeds the code requirements.

7. Why are the seven Rad Monitor Pumps inlcuded in the IST program?

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