



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

January 17, 1990

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington DC 20555

Dear Sir:

Inservice Inspection (ISI) Relief Requests  
Request for Additional Information

By letter dated September 29, 1989, Portland General Electric Company (PGE) submitted Revision 1 to Topical Report PGE-1049, "Trojan Nuclear Plant Inservice Inspection Program Second Ten-Year Interval", to the Nuclear Regulatory Commission (NRC) for review. By telephone call on December 18, 1989, Mr. Roby Bevan requested that full-size piping and instrument diagrams (P&IDs) be provided as an aid in the review of relief requests contained in the revised ISI program. The enclosed P&IDs are highlighted to indicate the particular portions of piping for which relief is requested from the hydrostatic test requirements of American Society of Mechanical Engineers (ASME), Section XI.

Sincerely,

Enclosures

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission  
(w/o enclosures)

Mr. David Stewart-Smith  
State of Oregon  
Department of Energy  
(w/o enclosures)

Mr. R. C. Barr  
NRC Resident Inspector  
Trojan Nuclear Plant  
(w/o enclosures)

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RELIEF REQUEST RR-B3

Component Description:

(1) Reactor Coolant System (RCS) (M-201).

- (a) Reactor coolant loop flow meter elbow taps for flow transmitters FT-414, -415, -416, -424, -425, -426, -434, -435, -436, -444, -445, and -446.
- (b) Reactor coolant loop resistance temperature detector (RTD) system vent and drain lines (3/4-in. RC-2501R-17).
- (c) RTD system return instrument lines for flow indicator switches FIS-417, -427, -437, and -447.
- (d) Reactor coolant loop sampling lines from Loop 1 to manually operated globe valve SS648 and from Loop 3 to manually operated globe valve SS649 (3/4-inch RC-2501R-30 and CCB-2).
- (e) Reactor vessel inner and outer seal monitoring tube piping to manually operated globe valves 8069A and 8069B (3/4-inch RC-2501R-15).
- (f) Pressurizer spray control valve bypass lines (3/4-inch RC-2501R-4).
- (g) Pressurizer instrument lines for level transmitters LT-459, -460, -461, and -462 and pressure transmitters PT-455, -456, -457, -458, -467A, and 467B.
- (h) Pressurizer steam sampling line from the pressurizer power-operated relief valve piping to manually operated globe valves 8078 and 8094 (3/4-inch RC-2501R-29).
- (i) Pressurizer liquid sampling line from the pressurizer to manually operated globe valve 8080 (3/4-inch RC-2501R-29).
- (j) Pressurizer safety valve seal water drain lines to manually operated globe valve 8093 (3/4-inch RC-2501R-29).

(2) Chemical and Volume Control Systems (M-202, M-203).

- (a) Reactor coolant pump (RCP) seal bypass lines from flow orifices FO-1957, -1958, -1959, and -1960 to air-operated globe valve CV-8142 (3/4-inch CS-2501R-28).
- (b) RCP seal leakoff lines from the RCP to air-operated globe valves CV-8141A, CV-8141B, CV-8141C, and CV-8141D (2-inch CS-2501R-28).

RELIEF REQUEST RP-B3 (continued)

- (c) RCP seal injection and seal bypass vent and drain lines from the Class 1 piping to manually operated globe valves 8363A, 8363B, 8363C, 8363D, 8364A, 8364B, 8364C, and 8364D.
  - (d) 3-inch CS-2501R-5 between 8378B and CV-8146.
  - (e) 3-inch CS-2501R-4 between 8393 and 3-inch CS-2501R-5.
  - (f) 3-inch CS-2501R-6 between 8379B and CV-8147.
  - (g) 2-inch CS-2501R-28 between 8352A,B,C,D and 8350A,B,C,D.
- (3) Residual Heat Removal System (RHR) (M-205).
- RHR instrument sensing lines for pressure transmitters PT-403 and -405.
- (4) Safety Injection System (SI) (M-206).
- (a) Accumulator discharge test line connections (3/4-inch SI-2501R-22) from the Class 1 piping to air-operated globe valves CV-8877A, CV-8879A, CV-8877B, CV-8879B, CV-8877C, CV-8879C, CV-8877D, and CV-8879D.
  - (b) Boron injection tank T-207 discharge to the RCS cold-legs test line connections (1-inch SI-2501R-23) from the Class 1 piping to air-operated globe valve CV-8882.
  - (c) SIS pumps P-203A and P-203B discharge to the RCS loops hot-legs test line connection (3/4-inch SI-2501R-22) from Class 1 piping to air-operated globe valves CV-8889A, CV-8889B, CV-8889C, and CV-8889D.

ASME Code Class:

ASME XI Class 2 - All Hydrostatic and Pressure Testing.

ASME XI Examination Requirements:

Subsection IWC, Table C-H, Item No C7.40 requires that the system hydrostatic test pressure shall be at least 1.10 times the system pressure,  $P_{sv}$ , for systems with design temperature of 200°F or less, and at least 1.25 times the system pressure,  $P_{sv}$ , for systems with design temperature above 200°F. The system pressure,  $P_{sv}$ , shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure,  $P_d$ , shall be substituted for  $P_{sv}$ .



RELIEF REQUEST RR-B3 (continued)

Basis for Relief:

Request relief from the hydrostatic testing requirements of Class 2 piping that cannot be isolated from Class 1 piping. The subject lines are Class 2 penetrations into a Class 1 pressure boundary without an isolation valve or other means for isolating the Class 2 system from the Class 1 system for hydrostatic testing.

Alternative Examination:

Visual examination for evidence of leakage will be conducted on the identified portions of these systems at hydrostatic test pressures in accordance with the requirements of IWB-5222 for the adjoining Class 1 systems.