



BOSTON EDISON

Pilgrim Nuclear Power Station
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On October 5, 1993, a telephone conference was held between Boston Edison Company and the NRC to discuss the NRC Safety Evaluation Report for the Pilgrim Nuclear Power Station Inservice Testing Program.

As suggested by the NRC during the October discussions, BECo has deferred its response pending review of NUREG 1482, "Guidelines for Inservice Testing at Nuclear Power Plants", received in December, 1993 and additional guidance provided at the NRC-sponsored public meeting on NUREG-1482 held on February 2 & 3, 1994. The insights gained from review of NUREG-1482 and the NRC Public Meeting have been considered in developing our response.

As requested during the telephone conference, Attachment A to this letter provides meeting minutes of the issues discussed and our understanding of the actions necessary for resolution. Attachment B summarizes the actions necessary to resolve open issues and the schedule for resolution.

W. C. Rothert

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Attachment A

Notes of Telecon between
NRR and BECo on IST Program
Implementation

BECo Attendees: P. Cafarella P. Manderino
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NRR Attendees: P. Campbell R. Eaton
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Item #1: The method of granting relief in the SER pursuant to 10CFR50.55(f)(4)(iv) requires Boston Edison Company to upgrade the IST program and is a hardship. Additionally, relief requests approved via this method are presently being implemented as submitted until this issue is resolved. Boston Edison requested clarification on the method of relief approval described in the SER (using 10CFR50.55(f)(4) (iv) and requiring other portions of OM part 6&10 standards to be met) to specifically state what portions of OM 6&10 had to be complied with.

Boston Edison has a hardship with the method used for relief approval, specifically using 10CFR50.55(f)(4)(iv) to require testing in accordance with ASME B&PV Code, ASME Section XI Operations and Maintenance STANDARDS OM 6&10. The NRC Safety Evaluation Report (SER) provision which requires the licensee to implement "all related requirements" of the OM standard creates confusion by requiring BECo to implement two Code Standards simultaneously for similar components within the IST Program. In addition, the meaning of "all related requirements" is broad and open to interpretation.

Our understanding of the NRC position is that for relief granted to date and in the future the following applies. The condition stating the licensee implement all related requirements refers only to the related sections of the Code. This would only include the paragraph related to the item reviewed.

The NRC also stated that they did not expect the licensee to rewrite the Relief Requests in accordance with OM 6&10.

The NRC stated OM 6&10 streamlined Section XI requirements and provided a more conclusive means of monitoring degradation. The NRC suggested that BECo could review OM 6&10 to determine a time period for implementing the requirements and propose a schedule for implementation. The NRC also noted that a NUREG (1482) was being issued within the next few months that would explain this position and further clarify the intent. We agreed to review this issue and evaluate the impact.

Summary: BECo maintains that NRR's position is a hardship and leaves the licensee open to future audit questions/findings due to the broad interpretations of 50.55(f)(4) relief request approvals.

Attachment A

IST-NRC Review of IST Program (cont'd.)

Summary (cont'd.):

BECo has invested considerable resources to implement our ten year IST Program upgrade submitted on November 25, 1992. This upgrade addressed all NRC questions and issues presented as part of the April, 1991 and February, 1992 Safety Evaluation Reports. Final procedure adjustments from revised test methods are still being incorporated. The NRC is indirectly requesting as a condition for relief another upgrade to implement the OM 6&10 Standards with subsequent procedure workscope. This will make the fourth major IST upgrade that BECo has undertaken since 1988. BECo has shown a practice of continued improvement in IST Program effectiveness. Each upgrade requires major workscope including a shake out period to refine test methods and resolve new discrepancies that may occur. This refinement period lasts several months after full program implementation and is necessary to maintain effective and efficient Program control.

BECo believes further NRR clarification of relief requests granted under 50.55(f)(4) is necessary before program adjustments can be incorporated. BECo will continue to review this issue and incorporate the insights provided within NUREG 1482.

Item #2: NRC's position of requiring justification for not performing non-intrusive testing on a quarterly or C/SD frequency for some check valves is not consistent with Code requirements, industry practice or OM-22 Working Group (Anomaly #3 and #5, which impact RV-01, RV-02, RV-05, RV-12, RV-13, RV-21, RV-27 and RV-37).

The NRC stated it understood non-intrusive testing on a quarterly basis was not practical unless plant-installed equipment was available and it was aware of the direction the ASME OM 22 Check Valve Committee was taking regarding this issue. However, the NRC recommended the licensee review each check valve covered by the related relief requests and prepare a more detailed justification of why cold shutdown testing was not feasible. The PNPS relief requests were prepared such that it was not always apparent that certain testing methods using available system indicators, plant installed non-intrusive equipment, etc. could be used. We agreed to revise the applicable relief requests and include specific discussion about the use and frequency of plant installed diagnostics or instrumentation.

Summary: As a matter of practice, BECo does not pursue relief from valve exercising requirements until all feasible methods for verifying an exercise using plant installed equipment and instruments have been reviewed and considered impractical. For cold shutdown testing, additional methods that can be conducted consistently without hardship and provide reliable results are also considered and applied as applicable. The above practices, while not uniquely stated, have been implied within the specific description of component function and related system configuration and through use of the term "the only practical method of verifying.....is" within the effected relief requests.

Attachment A

IST-NRC Review of IST Program (cont'd.)

BECO agrees that the above relief requests can be made clearer by adding additional information. We will revise the applicable relief requests previously submitted to specifically discuss potential test methods that were considered for quarterly and cold shutdown testing. For check valve position verification, BECO does not consider the use of portable diagnostic test equipment (not plant installed) feasible for providing consistent and reliable results without creating a plant hardship for quarterly or cold shutdown testing.

Item #3: NRC position to Stroke Time Main Steam SRVs is not reasonable because, (See Anomaly #8):

- a. OM-1 Committee thought it unreasonable to stroke time SRVs.
- b. OM-1 Code is an all-inclusive comprehensive standard.
- c. All SRVs are stroked once/refuel interval and one SRV (Pilot and Body) is stroked tested once/refuel interval at test lab.
- d. No reasonable method to stroke time (acoustic monitors or bypass valve closure).

NRC stated that there were different opinions on how Safety Relief Valves should be categorized. The OM chairman has the opinion that SRVs were category "C" valves and, therefore, stroke time did not apply. There are many BWR plants that classified their valves "A" and "C". The NRC mentioned that it would be acceptable to classify SRVs as category "C" as an interim solution. A recent code inquiry has been written to address this inconsistency. The NRC suggested the licensee review the inquiry and keep in touch with the Code Committee to see how they resolve this issue. The licensee should note within their response that this issue will be reviewed pending resolution of Code inquiry by OM Committee.

Summary: A BECO representative attended the ASME OM-1 Committee meeting in which the SRV stroke time Code inquiry was initially presented and discussed. BECO will continue to monitor industry resolution of this issue. For the present time, BECO will change the SRV status to category "C" and revise the IST Program accordingly. The IST Program categorization of SRVs will be maintained consistent with industry practice and OM Committee positions.

Item #4: HPCI and RCIC Governor Valve Stroke timing (Anomaly #9).

There seemed to be general agreement on Item #4 with respect to how the governor valves work and whether they could be classified as skid mounted equipment and removed from the IST Program. The licensee stated that it was conducting a review and will document reasons for the removal of these valves from the program based on their function as an integral part of the pump unit (skid mounted).

Attachment A

IST-NRC Review of IST Program (cont'd.)

Summary: BECo maintains that through strict application of IWV, these valves are categorized as control valves and are exempt from IST stroke testing. The 2 valves were augmented into the IST Program based on an NRC request (during 1988) in which the NRC advised BECo to submit relief requests for stroke timing. BECo has completed a review of these control valves, and they will be removed from the IST Program because they do not perform a fail safe role based on their function as an integral part of the pump unit (skid mounted).

Item #5: Need to review, discuss and resolve with the NRC a position statement for plant entering operational modes based on Technical Specification requirements.

The licensee explained the disagreement with this position statement and cited some examples where Technical Specifications provided clear guidance on operability (start up) with specified IST equipment out of service. The NRC agreed with the specific Technical Specification related operability statements and indicated this position was more applicable to IST equipment in which the specific valve or system is not Technical Specification related.

BECo stated that inoperable equipment is reviewed prior to startup and appropriate evaluations performed. NRC agreed and stated that there was no problem as long as inoperable IST components were evaluated somewhere and a 50.59 evaluation was used where applicable.

Summary: PNPS procedures and controls require the impact of degraded or failed components be reviewed for their effect on plant safety. For issues with potential outstanding question(s), plant support engineers of various disciplines are contacted and a detailed review is conducted as appropriate.

The evaluation process for degraded and/or inoperable components considers potential impact on total plant safety which encompasses a 10CFR50.59 applicability check. For the infrequent cases, where there is potential for an unanalyzed test or unreviewed safety question, a 50.59 Safety Evaluation is performed.

Attachment A

IST-NRC Review of IST Program (cont'd.)

Item #6: Need to revolve hardship that will occur if strict code accuracy requirements are applied to SSW tide measurement methods ($\pm 2\%$ accuracy). (Anomaly #6).

Boston Edison stated that a recent review of actual plant accuracies of the present PNPS tide level measurement method are extremely close (estimated at 2.06%) to the $\pm 2\%$ required by the Code. The NRC stated that they should not have a problem granting relief for a deviation this minor in nature.

Summary: BECo will revise RP-04 and provide additional information regarding SSW Pump Tide Level instrumentation.

Item #7: Need to review and adjust required time intervals based on NRC discussions and agreement of issues. Action items of six months and one year will need to be negotiated and extended.

NRC stated that it would not be a problem to provide additional time for resolution of program anomalies. Details for extended time to comply should be worked out with the Project Manager.

Summary: Details of time intervals for resolution and compliance of SER Action Items will be resolved through the PNPS/NRR Project Manager.

Item #8: Need to discuss and resolve SER discrepancies that exist between the TER Body and Appendix "A" anomalies. Words describing nature of relief approval and/or provisional requirements do not agree.

The licensee pointed out two discrepancies between the wording within the TER body and Appendix "A" anomalies. In one case there was a discrepancy in the wording within Section 3.6.2.1.2 of the Technical Evaluation Report, (RV-20) however, wording existed in a subsequent paragraph which clarified the discrepancy and, therefore, NRC felt no action was required. In a second case, Table 1 of the SER lists RV-29 approved pursuant to paragraph f(4)(iv) in contradiction to Appendix "A" Anomaly #2 which lists RV-29 as being approved in accordance with Generic Letter 89-04. The NRC stated it would remove reference to RV-29 from Anomaly #2 of Appendix A.

Attachment B

<u>Item</u>	<u>Issue</u>	<u>Action</u>	<u>Schedule</u>
1	Review NUREG 1482 and/or Impact for Program Revision to OM6&10	Evaluate impact	6/30/94
2	Review relief requests RV-01, RV-02, RV-05, RV-12, RV-21, RV-27, and RV-37, and revise as applicable to specifically discuss test methods which were considered for quarterly and cold shutdown testing.	Review and Revise Relief Requests as applicable	To be Determined
3	NRC position on stroke timing on main steam safety relief valves.	Change status of valves to category "C" and revise IST program.	6/30/94
4	HPCI/RCIC Governor Valve Stroke time	Document removal from IST program.	6/30/94
6	Self Service Water System Pump Tide Level instrumentation	Revise RP-04	6/30/94
	SER Table 1 states RV-29 is approved pursuant to paragraph f(4)(iv) in contradiction to Appendix "A" anomaly #2 which states RV-29 is approved in accordance with GL 89-04	NRC to revise SER to correct	To be Determined