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December 7, 1990

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2  
Inservice Testing Program For Pumps and Valves  
Revisions 8 and 9 respectively  
NRC Docket Nos. 50-454 and 50-455

- Reference:
- a) May 11, 1990 letter from M. Richter to USNRC providing a revised schedule for Implementation of Generic Letter 89-04 Guidance.
  - b) July 6, 1990 letter from T. Schuster to USNRC requesting review and approval of Draft Relief Requests VR-21 and VR-22.
  - c) September 14, 1990, NRC Safety Evaluation issued for Draft Relief Requests VR-21 and VR-22 of the Byron Inservice Testing Valve Program.
  - d) September 14, 1990, NRC Supplemental Safety Evaluation issued for review of Byron Inservice Testing Pump and Valve Programs, Revisions 7 and 8.
  - e) October 17, 1990, NRC Safety Evaluation and Technical Specification Amendment 39 deleting Type C Test requirements for Steam Generator Blowdown Valves.

Dr. Murley:

Attached is the Inservice Testing (IST) Program for Pumps and Valves, Revisions 8 and 9 respectively, for Byron Station Units 1 and 2. Enclosure 1 provides a brief summary of the changes to the IST Pump Program and Enclosure 3 is the actual Revision 8 document with revision lines in the right hand margin indicating the affected text. Enclosure 2 provides a brief summary of the changes to the IST Valve Program and Enclosure 4 is the actual Revision 9 document with revision lines in the right hand margin indicating the affected text.

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By transmittal of the Byron IST Program for Pumps and Valves, Revisions 8 and 9 respectively, the following major tasks are being accomplished:

- 1) Major changes to the program were made to reconcile it with Generic Letter 89-04 guidance. Submittal of these IST Program revisions complies with a commitment made in the letter of Reference (a). The letter stated an IST Program revision incorporating Generic Letter 89-04 guidance would be submitted within 90 days of receipt of the supplemental SER for IST program Revision 7 for pumps and Revision 8 for valves. One significant change was the addition of backflow tests (BT) to various check valves in Valve Program Table 4.3 to comply with Generic Letter 89-04 requirements.
- 2) Request for NRC review and approval of a revised Draft Relief Request VR-1. Type C Testing requirements for Steam Generator Blowdown Valves were deleted from Technical Specifications by issuance of Amendment #39 in reference (e). The revised Draft Relief Request VR-1 removes reference to the Steam Generator Blowdown Valves to align VR-1 with Technical Specifications. The Steam Generator Blowdown Valves will continue to be leakage tested, but under different requirements, since they remain in the Valve Program Tables of Section 4.3.
- 3) Request for NRC review and approval of revised Draft Relief Request VR-12. Added eight valves to the list of valves that normally stroke in 2 seconds or less.
- 4) Request for NRC review and approval of Draft Relief Requests VR-18, 19, and 20 and revised Draft Relief Requests PR-1 and PR-2. The changes of VR-20 reflect a program improvement in valve stroke time trending.
- 5) Withdrawal of Draft Relief Request VR-21 submitted in the letter of Reference (b) and reviewed by the NRC in Reference (c). As a result of a teleconference with the NRC staff and the subsequent Safety Evaluation issued in Reference (c) an alternate method of testing the check valves of VR-21 in compliance with GL 89-04 guidance was determined.

Efforts are underway to disposition Draft Relief Request VR-22 and final resolution will be provided at a later date. The NRC staff granted interim relief in Reference (c) for the affected valves of VR-22 allowing the current testing methods to continue for relief period specified as 1 year from September 14, 1990 or until the next refueling outage. New Draft Relief Request PR-7 for the Essential Service Water Makeup Pumps is not complete and a supplemental transmittal required by Reference (d), providing PR-7 in its entirety, will be transmitted by March 15, 1991.

Completion of NRC review and approval of the new and revised Draft Relief Requests is requested by February 16, 1991, so that comments may be incorporated into the March 1991 submittal required by the NRC Safety Evaluation of Reference (d). If this schedule cannot be met, we request the review be completed no later than April 15, 1991 to allow adequate time for IST procedure revision for the fall 1991 Unit 1 Refueling Outage.

Please direct any questions you may have concerning this matter to this office.

Respectfully,



Terence K. Schuster  
Nuclear Licensing Administrator

Enclosures

cc: Resident Inspector-Byron w/o enclosures  
T. Shia - NRR  
S. Sands - NRR w/o enclosures  
Regional Administrator - RIII w/o enclosures

Enclosure 1

Summary of the Revision 8 Changes  
to the Byron Station IST Program for Pumps

Section 3.0: Table of Contents

1. Added brief explanation of reason for deleting note 4.
2. Added Draft Relief Request PR-07

Section 3.1: Program Description

1. Revised to add the status and requirements of NRC approval on relief requests.
2. Revised to delete remarks on Action Pumps
3. Revised to explain when reference values are revised; after pump replacement, repair, routine servicing and any other reasons.

Section 3.2: References

1. Added this section to list references used in development of the IST Program Plan for Pumps, including NRC SER'S and IST Plan Review Responses.

Section 3.3: Program Tables

1. Added "following maintenance" description to when bearing temperatures are taken.
2. Added pump inoperable exemption period to quarterly test frequency description.
3. Added horizontal and vertical lines to the Pump Program Plan Tables.

Section 3.4: Notes

1. No changes, other than section number.

Section 3.5: Relief Requests

1. Added step number 9 to PR-1, PR-2, PR-5, and PR-6 to document approval status of each relief request.
2. Draft Relief Request PR-1 was revised to include the following changes:
  - a. Update to most recent revision of OMB-1989, Part 6.
  - b. Change the bearing where axial vibration readings will be taken for the CS and RH pumps from upper motor bearing to lower motor bearing.
  - c. Delete taking the CS and RH casing vibration due to lack of pump bearings.
  - d. Remove all references to the OSX02PA,B pumps (to be included in Draft Relief Request PR-07 at a later date).
3. Added Draft Relief Request PR-2 revision to eliminate recording of pump bearing temperatures on all pumps in the IST Program. This is consistent with industry and other CECO Stations practice as vibration trending quarterly is superior to bearing temperatures taken once per year for trending of pump performance. Note that the currently approved PR-2 already exempts 25 of 41 pumps from this requirement.
4. Added Draft Relief Request PR-07 which will encompass vibration monitoring of the OSX02PA,B Essential Service Water Makeup Pumps. The technical justification for relief will be provided by March 15, 1991.

ENCLOSURE 2

Summary of the Revision 9 Changes  
to the Byron Station IST Program for Valves

Section 4.0: Table of Contents

1. Added new Section 4.2
2. Added new Section 4.5
3. Added new Notes (from #23 on) and Relief Requests (from VR-18 on).
4. Added brief description of reason for deletion of Relief Requests VR-11 and VR-14.
5. Changed status of Relief Request VR-21 from "draft" to "withdrawn" (See changes to Section 4.6, item 10).
6. Changed status of Relief Request VR-22 from "draft" to "interim" (see changes to Section 4.6, item 11 for details of this change).

Section 4.1: Program Description

1. Added status and requirements of NRC approval on relief requests.
2. Added paragraph describing scope of Valve Program.
3. Added description of positions on valve stroke timing and check valve testing per NRC Generic Letter 89-04.
4. Added required response when valve data is in Required Action Range.
5. Added description of when new stroke time reference value changes are required.

Section 4.2: Program References

1. Added this section to list references used in development of the IST Program Plan for Valves.



### Section 4.3: Program Tables

1. Added description of check valve back flow testing method to part L.
2. Deleted Maximum Stroke Time method description. (former part M)
3. Added description of Technical Approaches and Positions (part U) and Notes (part P).
4. Deleted Maximum Stroke Time column in the Tables.
5. Added Technical Approaches and Position, and Notes columns in the Tables.
6. Added "closed" stroke direction to several check valves in the Tables as required by NRC Generic Letter 89-04, Attachment 1, Position #3.
7. Added "back flow" test methods for those check valves noted in #6 above.
8. Added new Relief Request, Technical Approaches and Positions, and Notes to the Table columns, where appropriate.
9. Updated P & ID number in the Tables to current revisions, where required.
10. Removed reference to VR-1 from the table listings for valves 1/2SD002A-H and 1/2SD005A-D (see changes to section 4.4, item 3 for details of this change).
11. Changed stroke test mode from "CS" to "OP" for valves 1/2SI8804B, 1/2SI8807A,B to correct a typing error.
12. Changed check valve full stroke test mode from "RR" to "CS" for valves 1/2SI8922A,B and 1/2SI8926 to correct a typing error.

### Section 4.4: Notes

1. Added valves 1/2RH8705A,B to Note 6 (see changes to section 4.6, item 6 for details) and added last sentence.
2. Added new Notes (#23 on)
3. Added Note 34 to document the fact that, due to a recent Byron Tech Spec Amendment #39 valves 1/2SD002A-H and 1/2SD005A-D are no longer considered to be 10CFR50 Appendix J type containment isolation valves. Therefore, they will no longer be tested in compliance with 10CFR50 Appendix J. They will now be tested in accordance with ASME Code Section XI, IWV-3420.
4. Added Note 35 to document the fact that valves 1/2RH8705A/B will be operability tested using an alternate method which has been identified as acceptable by NRC SER dated 9/14/90.

Section 4.5: Technical Approaches and Positions

1. Added new section to implement standard IST practices as outlined in the Conduct of ISI/IST Manual.

Section 4.6: Relief Requests

1. Added new Relief Requests (VR-18 on).
2. Removed valves 1/2SD002A-H and 1/2SD005A-D from Relief Request VR-01 (see changes to section 4.4, item 3 for details of this change)
3. Added itemized history of approval status for all previously submitted relief requests.
4. Added brief description of reasons for deletion of Relief Requests VR-07, VR-11, and VR-14.
5. VR-1: -Arranged in valve EPN order.  
-Added that trending requirements of IWV-3427(b) will not be utilized as allowed by NRC Generic Letter 89-04.
6. VR-2: -Noted sample disassembly plan given in VR-18 and allowed by NRC Generic Letter 89-04.
7. VR-4: -Noted sample disassembly plan given in VR-18 and allowed by NRC Generic Letter 89-04.
8. VR-8: -Revised "(Ct)" to "(Bt)" per new definitions.
9. VR-12: -Added 2SD002A-H.
10. Draft Relief Request VR-21 was withdrawn. No relief is required because valves 1/2RH8705A,B will be operability tested by verifying that there is depressurization in the applicable line when they are opened. This method was acceptable per NRC SER dated 9/14/90.
11. Relief Request VR-22 was changed from a "draft" relief request to an "interim" relief request. Interim relief was granted per NRC SER dated 9/14/90 for a 1 year period or until the next refueling outage (whichever is later) to permit further investigation of a possible alternate test of valve operability.