

OCT 8 1982

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Docket No.: 50-373

MEMORANDUM FOR: A. Schwencer, Chief
Licensing Branch No, 2, DL

FROM: A. Bournia, Project Manager
Licensing Branch No. 2, DL

SUBJECT: PUMP AND VALVE INSERVICE TESTING PROGRAM MEETING FOR
LA SALLE COUNTY STATION, UNIT 1

Attached are the minutes of the meeting held at the La Salle County Station with Commonwealth Edison Company. The purpose of the meeting was to discuss questions resulting from our consultant's (EG&G) review of La Salle, Unit 1 pump and valve inservice test program (IST). You will note that our consultants have taken certain positions which are contrary to our Technical Specifications. We are pursuing these areas with the responsible reviewers to resolve these inconsistencies. When these matters have been resolved, our consultant and licensee will be notified of the resolutions. Mr. H. Rockhold and T. Cook are the reviewers for La Salle from our consultants on IST.

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A. Bournia, Project Manager
Licensing Branch No. 2, DL

Attachment:
As stated

cc: See next page

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PDR ADOCK 05000373
P PDR

OFFICE	DL:LB#2/PM	DL:LB#2/BC					
SURNAME	ABournia:pt	ASchwencer					
DATE	10/08/82	10/08/82					

MEETING SUMMARY DISTRIBUTION:

DATE: OCT 8 1982

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EHylton
Project Manager A. Bournia
E. Case
D. Eisenhut/R. Purple
T. Novak
J. Youngblood
A. Schwencer
J. Kerrigan
E. Adensam
C. Thomas
F. Miraglia
W. Russell
D. Crutchfield
T. Ippolito
J. P. Knight
W. Johnston
D. Muller
T. Speis
R. Houston
L. Rubenstein
F. Schroeder
M. Ernst
J. Kramer
Attorney, OELD Woodhead
E. L. Jordan, J. M. Taylor, IE
Region III
Resident Inspector
ACRS (16)
OSD (7)
R. Bosnak
C. Hammer
F. Cherney
C. Poslusny

NRC PARTICIPANTS:

A. Bournia
Consultants (EG&G)

cc: See next page

La Salle

Mr. Louis O. DelGeorge
Director of Nuclear Licensing
Commonwealth Edison Company
P. O. Box 767
Chicago, Illinois 60690

-cc: Philip P. Steptoe, Esquire
Suite 4200
One First National Plaza
Chicago, Illinois 60603

Dean Hansell, Esquire
Assistant Attorney General
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

William G. Guldemon, Resident Inspector
LaSalle NPS, U.S.N.R.C.
P. O. Box 224
Marseilles, Illinois 61364

NOTEGRAM

Date September 29, 1982

To Gary Hammer From Herbert Rockhold/Tharan Cook
Org. Mechanical Engineering Branch Org. Reliability & Statistics Branch
Address NRC-DE Address EG&G Idaho, Inc.

TRIP REPORT FOR THE PUMP AND VALVE INSERVICE TESTING
PROGRAM WORKING MEETING FOR LASALLE, UNIT 1

On September 14 and 15, 1982, a working meeting was held at the LaSalle County Nuclear Station to discuss the questions resulting from our review of the LaSalle, Unit 1, pump and valve inservice test program (IST). Attached is a list of the meeting attendees, meeting minutes, and the questions that served as an agenda for the meeting.

The licensee was given a brief introduction outlining the agenda and the methods used for documentation of questions and responses. This was followed by detailed questioning concerning specific pumps and valves in the LaSalle, Unit 1, IST program. Significant discussions and observations are discussed below.

1. Commonwealth Edison Company (CECo) stated they would resubmit their IST program (pumps and valves) incorporating the changes discussed at the working meeting and would also update their program to the 1980 Edition through Winter of 1980 Addenda of the ASME Code. However, the utility declined to specify the date of the resubmittal due to personnel workload during the completion of startup testing.
2. When EG&G explained the present NRC position requiring pumps to be jogged monthly and one hydraulic parameter recorded, the utility stated that their Technical Specifications have been reviewed and approved by NRC and that the Technical Specifications are based on quarterly pump testing. On this basis, they requested a formal position statement or directive from NRC requiring them to perform modified pump testing monthly.

3. The following valves are presently excluded from the IST program because the utility has classified them as test valves and therefore exempt from the program. This was left as an open item at the working meeting for NRC to determine if the valves are exempt from the program as test valves. The valves are grouped according to system along with a brief description of valve function and EG&G's basis for recommending that they be included in the IST program.

High Pressure Core Spray

1E22-F010 - HPCS full-flow test to Condensate Storage Tank
1E22-F011 - HPCS full-flow test to Condensate Storage Tank
1E22-F023 - HPCS full-flow test to Suppression Pool

These valves receive an isolation signal to shut if the HPCS system is operating in a test configuration aligned to either the CST or the Suppression Pool and a HPCS system initiation signal is generated. At that time, the test configuration is automatically secured and the system aligns to the reactor vessel injection flowpath. The full-flow test valves have to shut, if open, to prevent diversion of flow from the injection flowpath.

Low Pressure Core Spray

1E21-F012 - LPCS full-flow test to Suppression Pool

This valve receives an isolation signal to shut if the LPCS system is operating in the test configuration and a LPCS system initiation signal is generated. The LPCS system automatically aligns to the reactor vessel injection flowpath. Valve F012 must shut, if open, to prevent diversion of flow from the injection flowpath.

Residual Heat Removal System

1E12-F021 - RHR "C" full-flow test to Suppression Pool

The LaSalle design utilizes the three loop RHR system, i.e., loops A and B capable of performing all system functions and loop C utilized only for low pressure coolant injection (LPCI). Valve F021 must shut to prevent diversion of flow from the reactor vessel injection flowpath if a LPCI initiation signal is generated while RHR "C" is being operated in the test mode. The isolation signal for F021 is generated by the RHR control logic.

NOTE: Valves 1E12-F024A and B, RHR "A" and "B" full-flow test valves, were included in the IST program.

Reactor Core Isolation Cooling

1E51-F022 - RCIC full-flow test to Condensate Storage Tank

1E51-F059 - RCIC full-flow test to condensate Storage Tank

These valves receive an isolation signal to shut if the RCIC system is operating in the test configuration and a RCIC initiation signal is generated. The RCIC system automatically aligns to the reactor vessel injection flowpath. These full-flow test valves must shut, if open, to prevent diversion of flow from the injection flowpath.

4. Testable check valves are not full stroke exercised. These check valves, manufactured by Anderson/Greenwood, are designed to stroke approximately 25% of full open. The licensee has agreed to identify these valves in the "Remarks" column of the IST program.
5. This is a summary of the open items contained in the minutes of the working meeting.

E.6 - Open item for NRC

G.3 - Open item for NRC

I.1 - Open item for the utility

I.2 - Open item for the utility

I.4 - Open item for NRC

J.3 - Open item for NRC
L.9 - Open item for NRC
M.7 - Open item for NRC
M.7 - Open item for the utility
Pump Testing Program - Open item for NRC

ss

cc: F. J. Balkovetz
R. Bosnak, NRC-DE
S. J. Bruske *SB*
F. Cherny, NRC-DE
B. Guldemon, NRC-EDO
G. Hammer, NRC-DE
T. L. Cook
R. E. Lyon *ll*
H. C. Rockhold
B. F. Saffell
A. Bournia, NRC-DL

ATTENDANCE LIST

INSERVICE TESTING PROGRAM WORKING MEETING

PLANT LaSalle County Station

DATES September 14 and 15, 1982

<u>NAME</u>	<u>REPRESENTING</u>
Anthony Bournia	NRC-DL
Herb Rockhold	EG&G Idaho, Inc.
Terry Cook	EG&G Idaho, Inc.
Don Zebrauskus	CECO ISI Coordinator-LaSalle
Richard Hylka	CECO ISI Coordinator-Dresden
Gerald Zwarich	S&L Project Management
John C. Renwick	LaSalle County Station
Charles W. Schroeder	Nuclear Licensing Administrator
Bill Guldemon	NRC Senior Resident Inspector
David S. Berkman	LaSalle County Station
George Crane	CECO Project Engineering Group

MEETING MINUTES

LASALLE COUNTY STATION, UNIT 1, IST PROGRAM

SEPTEMBER 14 & 15, 1982

A. General Comments and Questions

1. The IST program was written utilizing the same edition of the Code as the Preservice Testing Program. The IST program resubmittal will be updated to the 1980 Edition through Winter 1980 Addenda of ASME Section XI.
2. Valves that are leak tested are tested to Technical Specifications with the type of leak test identified in FSAR Table 6.2.21. Valves that perform a pressure isolation function will be identified in the licensee's resubmittal.
3. P&ID was provided. See additional remarks at the end of these minutes.
4. Testable check valves are not full stroke exercised. These check valves, manufactured by Anderson/Greenwood, are designed to stroke approximately 25% of full open. The licensee has agreed to identify these valves in the "Remarks" column of the IST program.

B. Diesel Generator System

1. Yes. 1DG-002 is the correct valve.
2. Yes. Valve listing was duplicated.

Extra Question

Reference Relief Request RV-01: The valves listed in this relief request are all service water strainer backwash valves. The licensee may delete them from the IST program, if after further research, it is determined that the valves perform no safety function. If the valves are not deleted from the program, the relief request will be expanded to explain that the valves respond to a differential pressure signal across the associated service water strainer and specific problems encountered while stroke timing will be addressed.

C. Feedwater

1. Valves 1B21-F010A and -F010B function as feedwater inboard containment isolation valves and will be changed to Category AC.
2. The test frequency of valves 1B21-F032A and -F032B will be changed to cold shutdown. The relief request will be rewritten to explain that partial stroke exercising may not be possible during power operation because the test operator may not be able to move the disc against full power feedwater flow. Additionally, feedwater flow disturbances created during valve exercising may cause a loss of reactor water level control resulting in a reactor trip. This portion of the startup testing had not been attempted as of the date of the working meeting.

D. Containment Combustible Gas Control

1. Yes. The system configuration is the same for both units. No further questions.

E. High Pressure Core Spray System

1. Valve 1E22-F005 is leak tested and will be changed to Category AC.
2. Valves 1E22-F012 and -F015 are leak tested and will be changed to Category A.
3. Valve 1E22-F016 cannot be full or partial stroke exercised during power operation or cold shutdown because the water in the Suppression Pool is low quality water and would contaminate the HPCS system. The relief request will be rewritten to explain that this valve is full stroke exercised during refueling outages when the HPCS system is aligned to conduct a Suppression Pool suction flowpath test.
4. Relief valves 1E22-F014 and -F035 will remain Category C because HPCS

system pressure is always higher than containment accident pressure due to the operation of the HPCS water leg pump.

5. Valve 1E22-F038 is a locked open, manual valve (Category E) located inside containment. Its position is verified by Station Administrative Procedures and will be deleted from the IST program when the program is updated to the 1980 Code.
6. Valve 1E22-F354 is not leak tested, is not safety related, and will not be included in the IST program.

Valve 1E22-F-23 is leak tested to special requirements of Technical Specifications but is not leak tested as a pressure isolation valve or to Appendix J requirements. The licensee's position is that valves -F023, -F010, and -F011 are exempt from the IST program because they are classified test valves. This is an open item for NRC to determine if these valves are exempt as test valves.

F. Drywell Instrument Nitrogen System

1. The relief request for valves 1IN001A, -1B, -17, -74, and -75 will be rewritten to identify specific equipment and instrumentation affected while exercising these valves during power operation and cold shut-down. The valves will be full stroke exercised during refueling outages.
2. Valves 1IN017, -74, and -75 are fast acting valves. The relief request from timing requirements will be rewritten to address fast acting valves. (A generic relief request will be provided to address all fast acting valves in the IST program.)
3. Valve 1IN031 is leak tested in the reverse direction and will be changed to Category A. The generic fast acting valve relief request will apply.

4. Valves 1B21-F024A,B,C,D, -F040C,D,E,R,S,U, and V are ADS/RELIEF valve accumulator check valves and cannot be exercised during power operation or cold shutdown because the containment is inerted and is not routinely de-inerted each cold shutdown. Constant pressure monitoring is installed to verify valve closure and the valves are full stroke exercised open during ADS valve testing following refueling.
5. Valves 1IN100 and 1IN101 are not safety related and will be deleted from the IST program.
6. Valves 1B21-F036C,D,E,R,S,U, and V are check valves installed in a non-safety grade system and will not be included in the IST program.

Valves 1IN043 and 44 will be included in the program and categorized C. Relief will be requested to exercise at refueling outages. The basis for relief will explain equipment affected in the containment.

G. Low Pressure Core Spray

1. Valves 1E21-F001, -F005, and -F011 are leak tested and will be changed to Category A.

Valve 1E21-F006 will be changed to Category AC and exercised at cold shutdown.

Valves 1E21-F018 and -F031 are relief valves and will remain in the program as Category C.

2. Valve 1E21-F051 is a locked open, manual valve (Category E) located inside containment. Its position is verified by Station Administrative Procedures and will be deleted from the IST program when the program is updated to the 1980 Code.

3. Valve 1E21-F012 is leak tested to special requirements of Technical Specifications but is not leak tested as a pressure isolation valve or to Appendix J requirements. The licensee's position is that this valve is exempt from the IST program because it is classified a test valve. This is an open item for NRC to determine if this valve is exempt as a test valve.

Valve 1E21-F333 is not leak tested, is not safety related, and will not be included in the IST program.

H. Main Steam System

1. Yes. ADS/RELIEF valves will be changed to Category BC. A relief request will be provided to justify exercising at a refueling outage frequency.

I. Primary Containment Vent and Purge System

1. Valves 1VQ032 and -35 are an open item for the utility to determine the exercising frequency.
2. Valve 1VQ068 is an open item for the utility to determine exercising frequency.
3. Valves 1VQ047, -48, -50, -51, -42, and -43 are leak tested to Appendix J requirements and will be changed to Category A.
4. Valves 1CM012 and -4 are not leak tested because the system design does not permit testing. These valves are excess flow check valves, are not safety related, and will not be included in the IST program.

Valves 1PC001A, -1B, -1C, and -1D are vacuum breakers and will be included in the IST program as Category C. Relief will be requested to exercise these valves at refueling outages based on the Technical

Specifications refueling interval which is 18 months. This is an open item for NRC to determine if this exercising frequency is acceptable for these valves.

J. Control Rod Drive Hydraulic System

1. Valves 1C11-F010 and -F011 are not leak tested and will remain in the IST program as Category B.
2. All control rods are scram tested after each refueling or after maintenance is performed on a control rod drive. Ten percent of the control rods are scram tested on a rotating basis every 120 days.
3. Valves 1C11-D001-115 (charging water header check) and 1C11-D001-138 (cooling water header check) are currently verified shut per Technical Specifications at an 18 month interval. The utility feels this is adequate and does not want to include them in the IST program. This is an open item for NRC to determine if these valves should be included in the IST program.
4. 1C11-F0110A, -F0110B, and -F009 are not safety related and will not be included in the IST program.

K. Reactor Building Equipment Drain System

1. Valves 1RE0 24, 25, 26, 29, 1RF012, and 13 will be changed to active and exercised and timed quarterly. No relief required.

L. Residual Heat Removal System

1. Valve 1E12-F004A is leak tested and will be changed to Category A.

Valve 1E12-F016A is leak tested to Appendix J requirements and will be changed to Category A.

Valve 1E12-F017A is leak tested to Appendix J requirements and will be changed to Category A.

Valve 1E12-F027A is leak tested and will be changed to Category A.

Valve 1E12-F042A is leak tested and will be changed to Category A.

Valve 1E12-F053A is leak tested and will be changed to Category A.

Valve 1E12-F064A is leak tested and will be changed to Category A.

Valve 1E12-F023 is leak tested to Appendix J requirements and will be changed to Category A.

Valve 1E12-F024A is leak tested and will be changed to Category A.

Valve 1E12-F025A is a relief valve and will remain in the IST program as Category C because RHR system pressure is always higher than containment accident pressure due to the operation of the RHR system water leg pump.

Valve 1E12-F088A is a relief valve and will remain Category C.

Valves 1E12-F041A and -F050A are leak tested and will be changed to Category AC.

Valve 1E12-F302 is not safety related and will be deleted from the IST program. This valve is installed in a line that has a spool piece removed and the end of the line is flanged.

2. Valves 1E12-F090A and -F092A are locked open, manual valves (Category E) located inside containment. Their position is verified by Station Administrative Procedures and both will be deleted from the IST program when the program is updated to the 1980 Code.

3. Valves 1E12-F099A and -F327A are testable check bypass valves, are not safety related, and will not be included in the IST program.

4. Valve 1E12-F004B is leak tested and will be changed to Category A.

Valve 1E12-F016B is leak tested to Appendix J requirements and will be changed to Category A.

Valve 1E12-F017B is leak tested to Appendix J requirements and will be changed to Category A.

Valve 1E12-F027B is leak tested and will be changed to Category A.

Valve 1E12-F042B is leak tested and will be changed to Category A.

Valve 1E12-F053B is leak tested and will be changed to Category A.

Valve 1E12-F064B is leak tested and will be changed to Category A.

Valve 1E12-F024B is leak tested and will be changed to Category A.

Valve 1E12-F025B is a relief valve and will remain in the IST program as Category C because RHR system pressure is always higher than containment accident pressure due to the operation of the RHR system water leg pump.

Valve 1E12-F088B is a relief valve and will remain Category C.

Valve 1E12-F030 is a thermal relief valve and will remain Category C.

Valves 1E12-F041B and -F050B are leak tested and will be changed to Category AC.

5. Valves 1E12-F090B and -F092B are locked open, manual valves (Category E)

located inside containment. Their position is verified by Station Administrative Procedures and both will be deleted from the IST program when the program is updated to the 1980 Code.

6. Valves 1E12-F099B and -F327B are testable check bypass valves, are not safety related, and will not be included in the IST program.

7. Valve 1E12-F004C is leak tested and will be changed to Category A.

Valve 1E12-F042C is leak tested and will be changed to Category A.

Valve 1E12-F064C is leak tested and will be changed to Category A.

Valve 1E12-F025C is a relief valve and will remain in the IST program as Category C because RHR system pressure is always higher than containment accident pressure due to the operation of the RHR system water leg pump.

Valve 1E12-F088C is a relief valve and will remain Category C.

Valve 1E12-F0005 is a relief valve and will remain Category C.

Valve 1E12-F041C is leak tested and will be changed to Category AC.

8. Valves 1E12-F092C and -F020 are locked open, manual valves (Category E) located inside containment. Their position is verified by Station Administrative Procedures and both will be deleted from the IST program when the program is updated to the 1980 Code.

9. Valve 1E12-F327 is a testable check bypass valve, is not safety related, and will not be included in the IST program.

Valve 1E12-F021 is a system full flow test valve. The licensee's position is that this valve is exempt from the IST program because it is classified a test valve. This is an open item for NRC to

determine if this valve is exempt as a test valve.

10. Valves 1E12-F011A and -F011B are leak tested and will be changed to Category A.

Valves 1E12-F055A and -F055B are relief valves and will remain Category C.

Valves 1E12-F311A and -F311B are relief valves and will remain Category C.

11. Valves 1E12-F073A and -F073B are leak tested and will be included in the IST program as Category A passive.

Valves 1E12-F065A and -F065B are not safety related and will not be included in the IST program.

Valve 1E12-F089 is not safety related and will not be included in the IST program.

Extra Question

Valves 1E12-F093 and -F094 are not safety related and will be deleted from the IST program. These valves are installed in the same line as -F089 and this line has a spool piece removed with the ends of the line flanged.

The Category E valves listed will not be included when the program is updated to the 1980 Code.

M. Reactor Core Isolation Coolant System

1. The system is to be modified to allow equalizing pressure across valve 1E51-F064 during power operation. The relief request will be rewritten to identify specific problems associated with exercising -F064. This

valve is normally closed and is not a throttle valve so the steam line downstream cannot be warmed slowly.

2. Valves 1E51-F068 and -F069 are leak tested in the reverse direction to Appendix J requirements and will be changed to Category A.

3. Valves 1E51-F025 and -F026 are not safety related and will not be included in the IST program.

4. Valve 1E51-F013 is leak tested and will be changed to Category A.

Valve 1E51-F019 is leak tested and will be changed to Category A.

Valve 1E51-F031 is leak tested and will be changed to Category A.

Valves 1E51-F036A and -F036B are relief valves and will remain Category C.

Valve 1E51-F056 is a testable check and will remain Category C.

5. The relief request for valve 1E51-F013 will be expanded to explain that the valve cannot be exercised during power operation because interlocks are installed to trip the main turbine and reactor feed pumps when it is opened. This would cause a reactor trip.

6. Valve 1E51-F030 cannot be full or partial stroke exercised during power operation or cold shutdown because the water in the Suppression Pool is low quality water and would contaminate the RCIC system. The relief request will be rewritten to explain that this valve is full stroke exercised entering or leaving refueling outages when steam is available to run the RCIC turbine and when the RCIC system is aligned to conduct a Suppression Pool suction flowpath test.

7. Valve 1E51-F355 is a testable check bypass, is not safety related, and will not be included in the IST program.

Valves 1E51-F022 and -F059 are system full flow test valves. The licensee's position is that these valves are exempt from the IST program because they are classified test valves. This is an open item for NRC to determine if these valves are exempt as test valves.

Valve 1E51-F021 is an open item for the utility to determine if it performs a safety function.

N. Nuclear Boiler and Recirculating System

1. All excess flow check valves installed in instrument lines are currently operability tested and exercised during refueling outages. Since the operability test is a type of leak test, i.e., tested to verify that the valve will check flow, the valves will be included in the IST program as Category AC or specific reasons will be provided to justify not including a particular valve.

P. Reactor Water Cleanup System

1. Yes. The relief request will be expanded to include thermal shock, reactor water chemistry, and fuel warranty requirements.

Q. Standby Liquid Control System

1. Valves 1C41-F001A and -F001B will be full stroke exercised during refueling outages. The relief request will be expanded to address dilution of the solution tank during exercising.
2. Question was deleted. The relief request is satisfactory as written.
3. Valve 1C41-F008 is a locked open, manual valve (Category E) located inside containment. Its position is verified by Station Administrative Procedures and will be deleted from the IST program when the program is updated to the 1980 Code.

R. Primary Containment Chilled Water System

1. Relief request RV-17 will be expanded to address problems encountered when cooling is lost to the containment.

S. Containment Monitoring System

1. All valves in this section are currently full stroke exercised and stroke time measurements taken quarterly in accordance with Technical Specifications Table 3.6.3-1. The relief request addressing fast acting valves will apply to these valves.

Valve 1CM017A is leak tested and will be included in the IST program as Category A.

Valve 1CM018A is leak tested and will be included in the IST program as Category A.

Valve 1CM019A is leak tested and will be included in the IST program as Category A.

Valve 1CM020A is leak tested and will be included in the IST program as Category A.

Valves 1CM022A, -M024A, and -M025A are not leak tested and will be included in the IST program as Category B.

Valve 1CM017B is leak tested and will be included in the IST program as Category A.

Valve 1CM018B is leak tested and will be included in the IST program as Category A.

Valve 1CM019B is leak tested and will be included in the IST program as Category A.

Valve 1CM020B is leak tested and will be included in the IST program as Category A.

Valves 1CM021B, -M023B, and -M026B are not leak tested and will be included in the IST program as Category B.

Valve 1CM031 is leak tested and will be included in the IST program as Category A.

Valve 1CM032 is leak tested and will be included in the IST program as Category A.

Valve 1CM033 is leak tested and will be included in the IST program as Category A.

Valve 1CM034 is leak tested and will be included in the IST program as Category A.

Extra Question - Reactor Recirculating System

What is the safety related function of the reactor recirculating pump suction and discharge valves?

Answer: Suction valves 1B33-F023A and -F023B and discharge valves 1B33-F067A and -F067B are not safety related and will be deleted from the IST program.

Pump Testing Program

When EG&G explained the present NRC position requiring pumps to be jogged monthly and one hydraulic parameter recorded, the utility stated that their Technical Specifications have been reviewed and approved by NRC and that the Technical Specifications are based on quarterly pump testing. On this basis, they requested a formal position statement or directive from NRC requiring them to perform modified pump testing monthly.

INSERVICE TESTING PROGRAM
WORKING MEETING

DOCKET NO.:

PLANT NAME:

The following signatures indicate that the undersigned have reviewed the attached minutes of the IST working meeting and agree that they reflect the contents of the meeting. C.E.C.'s final resolution will be reflected in the revision to the Inservice Testing Program.

_____ agrees to provide a revised
IST submitted by To be determined later.

A. Bourria /
(NRC/CONSULTANT IST REVIEWER)

DATE: _____

John C. Renwick
(LICENSEE/APPLICANT)
REPRESENTATIVE

DATE: 15 Sept 1982

Valve Testing Program

A. General Comments and Questions

1. Why was the 1974 Edition through Summer '75 Addenda of ASME Section XI utilized for preparation of the LaSalle IST Program rather than the 1977 Edition?
2. Are all valves that perform a pressure isolation function and containment isolation function leak rate tested to 10 CFR 50 Appendix J and Section XI requirements?
3. Provide P&ID-M-93 Sheet 1 for our review at the working meeting.
4. Are all check valves that receive the "E" exercise testing full stroke exercised at the specified frequency?

B. Diesel Generator System

1. Should Valve 1DG-012 actually be 1DG-002 as indicated on the P&ID?
2. Valve 1DG009 is indicated in the valve listing on page 1 and 3. Are these listings for the same valve?

C. Feedwater System

1. What is the safety related function of check valves 1B21-F010A and B?
2. How are the check Valves 1B21-F032A and B partial stroke exercised during power operation.

D. Containment Combustible Gas Control System

1. Is this system configuration the same for Unit 1 as for Unit 2?

E. High Pressure Core Spray System

1. Review the safety related functions of testable check Valve 1E22-F005 to determine if it should be categorized A/C.
2. Review the safety related functions of Valves 1E22-F012 and 1E22-F015 to determine if they should be categorized A.
3. Provide the specific technical justification for not full or partial stroke exercising check Valve 1E22-F016 quarterly and during cold shutdowns. Is this valve full stroke exercised during refueling outages?
4. Review the safety related functions of relief Valves 1E22-F014 and 1E22-F035 to determine if they should be categorized A/C.
5. Is a check of valve position indicators performed per 1WV-3300 for Valve 1E22-F038?
6. Review the safety related functions of the following valves to determine if they should be included in the IST program and categorized as indicated.

Category A

1E22-F354 (location C-6)
1E22-F023 (location C-4)

Category B

1E22-F010 (location D-4)
1E22-F011 (location D-3)

F. Drywell Instrument Nitrogen System

1. Provide the specific technical justification for not full stroke exercising the following valves during cold shutdowns.

1IN001A
1IN001B
1IN017

1IN074
1IN075

2. Provide the specific technical justification for not stroke timing the following valves.

1IN017
1IN074
1IN075

3. Review the safety related function of Valve 1IN031 to determine if it should be categorized A. Provide the specific technical justification for not stroke timing this valve.
4. Provide a more specific technical justification for not exercising check Valves 1B21-F024 A, B, C, and D and 1B21-F040 C, D, E, R, S, U, and V during cold shutdowns.
5. Review the safety related function of Valves 1IN100 and 1IN101 to determine if they should be categorized A. Provide the specific technical justification for not full stroke exercising these valves during cold shutdowns.
6. Review the safety related functions of the following valves to determine if they should be included in the IST program and categorized as indicated.

Category C

1B21-F036 C	(location D-2)	P&ID 66-02
1B21-F036 D	(location D-4)	
1B21-F036 E	(location D-7)	
1B21-F036 R	(location D-7)	
1B21-F036 S	(location D-6)	
1B21-F036 U	(location D-2)	
1B21-F036 V	(location D-4)	
1IN043	(location D-5)	P&ID 66-07
1IN044	(location D-8)	

G. Low Pressure Core Spray System

1. Review the safety related functions of the following valves to determine if they should be categorized as indicated.

Category A

1E21-F001
1E21-F005
1E21-F011

Category A/C

1E21-F006
1E21-F018
1E21-F031

2. Is a check of valve position indicators performed per IWV-3300 for Valve 1E21-F051?
3. Review the safety related functions of Valves 1E21-F012 and 1E21-F333 (locations C-5 and C-7 respectively) to determine if they should be included in the IST program and categorized A.

H. Main Steam System

1. Review the safety related functions of the ADS safety/relief valves to determine if they should be categorized B/C.

I. Primary Containment Vent & Purge System

1. Why is the exercising frequency of Valve 1VQ035 different from 1VQ032?

2. Is Valve 1VQ068 ever open during power operation?
3. Review the safety related function of the following valves to determine if they should be categorized A rather than B.

1VQ047
 1VQ048
 1VQ050
 1VQ051
 1VQ042
 1VQ043

4. Review the safety related functions of the following valves to determine if they should be included in the IST program and categorized as indicated.

<u>Category A</u>	<u>Category C</u>
1CM012 (location C-6)	1PC001A (location D-6)
1CM004 (location B-3)	1PC001B (location E-6)
	1PC001C (location D-3)
	1PC001D (location E-3)

J. Control Rod Drive Hydraulic System

1. Review the safety related functions of valves 1C11-F010 and 1C11-F011 to determine if they should be categorized A.
2. What is the Technical Specification CRD scram testing frequency indicated in relief request RV-30?
3. Review the safety related functions of Valves 1C11-D001-115 and 1C11-D001-138 (locations D-7 and D-5 respectively) to determine if they should be included in the IST program and categorized C.
4. Review the safety related functions of Valves 1C11-F110A and B and 1C11-F009 (locations B-7 and B-6 respectively) to determine if they should be included in the IST program and categorized B.

K. Reactor Building Equipment Drain System

1. Are the following valves always shut during power operation?

1RE024
1RE025
1RE026
1RE029

1RF012
1RF013

L. Residual Heat Removal System

1. Review the safety related functions of the following valves to determine if they should be categorized as indicated.

<u>Category A</u>	<u>Category A/C</u>	<u>Category A/E</u>
1E12-F004A	1E12-F025A	1E12-F302
1E12-F016A	1E12-F041A	
1E12-F017A	1E12-F050A	
1E12-F027A	1E12-F088A	
1E12-F042A		
1E12-F053A		
1E12-F064A		
1E12-F023		
1E12-F024A		

2. Is a check of valve position indicators performed per IWW-3300 for Valves 1E12-F092A and 1E12-F090A?
3. Review the safety related functions of Valves 1E12-F099A and 1E12-F327A (locations C-7 and E-7 respectively) to determine if they should be included in the IST program and categorized A.
4. Review the safety related functions of the following valves to determine if they should be categorized as indicated.

Category A

1E12-F004B
1E12-F016B
1E12-F017B
1E12-F027B
1E12-F042B
1E12-F053B
1E12-F064B
1E12-F024B

Category A/C

1E12-F025B
1E12-F030
1E12-F041B
1E12-F050B
1E12-F088B

5. Is a check of valve position indicators performed per IWV-3300 for Valves 1E12-F090B and 1E12-F092B?
6. Review the safety related functions of Valves 1E12-F099B and 1E12-F327B (locations C-7 and E-7 respectively) to determine if they should be included in the IST program and categorized A.
7. Review the safety related functions of the following valves to determine if they should be categorized as indicated.

Category A

1E12-F004C
1E12-F042C
1E12-F064C

Category A/C

1E12-F005
1E12-F025C
1E12-F041C
1E12-F088C

8. Is a check of valve position indicators performed per IWV-3300 for Valves 1E12-F092C and 1E12-E020?
9. Review the safety related functions of Valves 1E12-F021 and 1E12-F327C to determine if they should be included in the IST program and categorized A.
10. Review the safety related functions of the following valves to determine if they should be categorized as indicated.

Category A

1E12-F011A
1E12-F011B

Category A/C

1E12-F055A
1E12-F055B
1E12-F311A
1E12-F311B

11. Review the safety related functions of the following valves to determine if they should be included in the IST program and categorized as indicated.

Category A

1E12-F073A (location E-3)
1E12-F073B (location E-5)

Category B

1E12-F065A (location B-2)
1E12-F065B (location A-7)

Category C

1E12-F089 (location F-5)

Category E

1FC040A (location E-7 P&ID M-87-02)
1FC042A (location E-7 P&ID M-87-02)
1FC045A (location E-6 P&ID M-87-02)
1FC040B (location D-7 P&ID M-87-01)
1FC042B (location C-7 P&ID M-87-01)
1FC045B (location C-6 P&ID M-87-01)

M. Reactor Core Isolation Coolant System

1. Provide a more detailed technical basis for not full stroke exercising Valve 1E51-F064 during power operation.
2. Review the safety related functions of Valves 1E51-F068 and 1E51-F069 to determine if they should be categorized-A.

3. Review the safety related function of Valves 1E51-F025 and 1E51-F026 (location D-6) to determine if they should be included in the IST program and categorized B.
4. Review the safety related functions of the following valves to determine if they should be categorized as indicated.

Category A

1E51-F013
1E51-F019
1E51-F031

Category B

1E12-F036A
1E12-F036B
1E51-F066

5. Provide a more detailed technical justification for not full stroke exercising 1E51-F013 during power operation.
6. Is check Valve 1E51-F030 full stroke exercised quarterly?
7. Review the safety related functions of the following valves to determine if they should be included in the IST program and categorized as indicated.

Category A

1E51-F355 (location C-8)

Category B

1E51-F022 (location E-6)
1E51-F059 (location E-5)

Category C

1E51-F021 (location B-4)

N. Nuclear Boiler and Reactor Recirculating System

1. Do the excess flow check valves on the instrument lines for this system provide a containment isolation function?

P. Reactor Water Clean-Up System

1. Is this system required to be in operation at all times during power operation?

Q. Standby Liquid Control System

1. Provide a more detailed technical justification for not full stroke exercising Valves 1C41-F001A and B during cold shutdown.
2. Provide a more detailed technical justification for not full stroke exercising check Valves 1C41-F006 and 1C41-F007 during cold shutdown.
3. Is a check of valve position indicators performed per IWV-3300 for Valve 1C41-008?

R. Primary Containment Chilled Water System

1. Provide a more detailed technical justification for not full stroke exercising all valves indicated on relief request RV-17 during cold shutdown.

S. Containment Monitoring System

1. Review the safety related function of the following valves to determine if they should be included in the IST program and categorized as indicated.

Category A

ICM017A (location F-7, P&ID M-156-01)
ICM018A (location E-7, P&ID M-156-01)
ICM019A (location B-7, P&ID M-156-01)
ICM020A (location B-7, P&ID M-156-01)
ICM022A (location E-3, P&ID M-156-01)
ICM024A (location E-3, P&ID M-156-01)
ICM025A (location A-4, P&ID M-156-01)
ICM017B (location F-7, P&ID M-156-02)
ICM018B (location F-7, P&ID M-156-02)
ICM019B (location B-7, P&ID M-156-02)
ICM020B (location B-7, P&ID M-156-02)
ICM021B (location E-3, P&ID M-156-02)
ICM023B (location E-3, P&ID M-156-02)
ICM026B (location A-4, P&ID M-156-02)
ICM031 (location C-6, P&ID M-156-04)
ICM032 (location C-6, P&ID M-156-04)
ICM033 (location B-7, P&ID M-156-04)
ICM034 (location B-7, P&ID M-156-04)

Pump Testing Program

- i. The current NRC position on IST pump testing frequency is the pumps be started and one parameter observed to verify satisfactory operation monthly and the complete Section XI specified test performed quarterly.