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

Subject: Beaver Valley Power Station, Unit No. 2 Docket No. 50-412, License No. NPF-73 Updated Inservice Testing Program, Issue 1, Revision 12

The purpose of this submittal is to provide the Nuclear Regulatory Commission (NRC) with an informational copy of revisions to the Beaver Valley Power Station Unit 2 (BVPS-2) Inservice Testing (IST) Program.

Enclosure 1 provides a summary of the IST program changes which have been incorporated into Revision 12.

Enclosure 2 is Issue 1, Revision 12 of the BVPS-2 IST Program. It has been determined that the IST program changes do not require NRC approval prior to implementation. This determination was made because all of the changes are either:

editoria! in nature, or

- in compliance with the 1983 Edition through Summer 1983 Addenda of the ASME XI Code, or
- in compliance with the positions delineated in Attachment 1 of Generic Letter No. 89-04, "Guidance on Developing Acceptable Inservice Testing Programs."

If you have any questions regarding this submittal, please contact Steve Sovick at (412) 393-5211.

Sincerely,

D. Sieber

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Enclosures

cc: Mr. L. W. Rossbach, Sr. Resident Inspector Mr. T. T. Martin, NRC Region 7 Administrator Mr. G. E. Edison, Project Manager



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ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV. 12)

- Corrected the "Valve Type" on the "Valve Testing Outline" sheets for Pressurizer Relief Tank Nitrogen Isolation Valve [2RCS*AOV101] (page 85) and Primary Water to Pressurizer Relief Tank and Seal Vent Pots Valve [2RCS*AOV519] (page 86) from "Diaphragm" to "Globe" valves. Only the "operator" for these valves is a diaphragm type.
- Corrected the "Valve Type" on the "Valve Testing Outline" sheets for Reactor Coolant Pump Seal Water Injection Isolation Valves [2CHS*MOV308A, B and C] (page 90) from "Globe" to "Gate" valves.
- 3) Revised the testing for or deleted the following valves in the BVPS-2 IST Program as a result of DCP-2040, "Removal from Service of Alternate Miniflow Valves 2CHS*MOV380A, 380B, 383A and 383B" (pages 89 and 90):
 - a) [2CHS*MOV275A, B and C] These Charging Pump Miniflow Line Isolation Valves will remain NSA open (administratively controlled) since they are now the only recirculation flowpath available for the Charging Pumps. In addition, [2CHS*MOV275B] will be de-energized in the open position. The DCP has permanently removed their SI closure signals and the valves will remain passively open. Their "Valve Category" has been revised from CLegory "B" to Category "B/P" (passive). The valves will no longer require stroke time testing, however a "remote position verification" (RPV) will still be required once a refueling outage per 2OST-47.3B.
 - b) [2CHS*MOV373] This Charging Pump Miniflow Discharge Header Isolation Valve will remain NSA open (administratively controlled) since it, combined with the three valves above, is now the only recirculation flowpath available for the Charging Pumps. The DCP has permanently removed its SI closure signal and the valve will remain passively open. The "Valve Category" has been revised from Category "B" to Category "B/P" (passive). The valve will no longer require stroke time testing, however a "remote position verification" (RPV) will still be required once a refueling outage per 20ST-1.10. As a result, Cold Shutdown Justification No. 12 (page 162) has been deleted from the IST Program for this valve.
 - c) [2CHS*MOV380A and B] These Alternate Miniflow Isolation Valves have been deleted from the BVPS-2 IST Program because they have been retired in place and will remain closed with power and control wiring permanently removed at the valves motor control centers.
 - d) [2CHS*MOV383A and B] These Alternate Miniflow Isolation Valves have been deleted from the BVPS-2 IST Program because they have been retired in place and will now be closed with power and control wiring permanently removed at the valves motor control centers.
 - e) [2CHS*RV450A and B] These Alternate Miniflow Relief Valves have been deleted from the BVPS-2 151° Program because they are no longer required to mitigate the consequences of an accident since this flowpath is now removed from service and isolated by the above MOV's.

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV. 12) (continued)

- 4) The "remote position verification" (RPV) requirement for Recirc Spray Pump Recirculation Valves [2RSS*MOV154C and D] (page 113) was deleted because these valve do not have remote position indication.
- 5) The referenced test for closure testing of the TDAFW Pump Discharge Check and Recirculating Valve [2FWE*FCV122] (page 133) has been changed from 2OST-24.6 to 2OST-24.4 at CSD.
- 6) Revised the referenced tests for the following valves [2SWS*57, 58, 59, 106, 107] and [2SWS*MOV103A, 103B, 106A, 106B] (pages 136 and 137) from 2OST-30.13 (which has been broken up into an "A" train and a "B" train test) to 2OST-30.13A and 2OST-30.13B. Their associated "Basis for CSJ" in Cold Shutdown Justification No's. 3 (page 157) and 46 (page 182), and "Basis for Relief" in Relief Request No. 20 (page 207) have also been revised accordingly.
- 7) The "NSA" positions for Containment Air Recirc Cooling Coils Inside and Outside Containment Service Water Inlet and Outlet Isolation Valves [2SWS*MOV153-1, 153-2, 154-1 and 154-2] (page 139) have been changed from "Open (O)" to "Shut (S)". The valves will also be de-energized closed on a permanent basis per TER-8369. Their "Valve Category" has been revised from Category "A" to Category "A/P" (passive). The valves will no longer require stroke time testing, but will continue to be Type-C leak tested per 2BVT 1.47.5 and Relief Request No's. 1, 2 and 28. In addition, a "remote position verification" (RPV) will no longer be required since the indicating lights will not be energized.
- Corrected the "Valve Size (In.)" on the "Valve Testing Outline" sheets for Residual Heat Removal Pump Deluge System Containment Isolation Valve [?FPW*AOV205] (page 143) from "6 inches" to "4 inches".
- 9) Revised the "Basis for CSJ" in Cold Shutdown Justification No. 3 (page 157) for the Service Water Pumps Discharge and Header Check Valves [2SWS*57, 58, 59, 106 and 107] to state, "Full stroking of these check valves may be possible during warm summer months when additional flowpaths and heat exchangers are in service, but can normally only be accomplished by aligning the service water system through additional flowpaths which are only used for accident conditions and through additional heat exchangers not normally in service". Also revised the "Alternate Test" to state, "Full stroke exercised open during warm summer months when additional flowpaths and heat exchangers are normally in service or at least at cold shutdown per 2OST-30.2(3) (6)".