PGE Portland General Electric Company

Bart D. Withers Vice President

December 3, 1982

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington DC 20555

Dear Mr. Clark:

Inservice Testing Relief Request

Pursuant to the NRC letter of October 7, 1982, attached is PGE's response to the NRC's request for additional information concerning Inservice Testing (IST) relief requests. We trust that the additional information provided herein will enable the NRC to complete its review of PGE's request for relief from certain IST requirements for pumps and valves at the Trojan Nuclear Plant.

Sincerely,

Bart D. Withers
Vice President
Nuclear

Attachment

c: Mr. R. H. Engelken, Regional Administrator
Region V
U. S. Nuclear Regulatory Commission

Mr. Lynn Frank, Director
State of Oregon
Department of Energy

A047

121 S.W. Salmon Street, Portland, Oregon 97204

RESPONSE TO NRC'S REQUEST FOR ADDITIONAL INFORMATION
CONCERNING IST RELIEF REQUESTS

1. NRC Request:

   Paragraph 3.2: Please verify the accuracy of or correct the formula for pump inlet pressure. As written, it appears that increasing "Intake Structure Level" would reduce the pump inlet pressure.

   PGE Response:

   The formula as written in Section 3.2.1 of our July 23, 1982 letter has been verified to be correct, but has been removed from the relief request as it is somewhat misleading. Pump suction pressure is determined based upon the Intake Structure water level. In order to determine an accurate differential pressure across the pump, the suction pressure is corrected to the level at which the discharge pressure measurement is made. The formula under question was the "as corrected" formula and therefore was somewhat misleading. The attached relief request has been revised to reflect the above clarification.

2. NRC Request:

   Paragraphs 3.2.2, 3.2.3, 3.2.4 and 3.2.5: The basis for granting relief from a test requirement is that the requirement is impractical. The fact that flow measurement instrumentation is not presently installed does not, by itself, make flow measurements impractical. Accordingly, please commit to including flow measurements in accordance with IWP-3100; or supplement the discussion of alternate testing provided in the PGE letters of July 23 and August 18, 1982, to demonstrate how the measured test parameters (together with any other test provisions, such as a fixed resistance flow path, or matching a point on a head flow curve, etc) will detect significant (per Table IWP-3100-2) degradation in flow capability, so that necessary corrective actions can be implemented.

   PGE Response:

   <u>Paragraph 3.2.2, Diesel Fuel Oil System (Pumps P144A and P144B)</u>

   These pumps are tested while providing flow from the diesel oil storage tanks to the emergency diesel generator fuel oil day tanks. Although this pathway does not have flow indication, flow rate is calculated by timing the level rise in the fuel oil day tank. The calculated flow rate is then compared with the test acceptance criteria (currently 20 gpm) as an indication of pump operability. The attached relief request has been revised accordingly to reflect the above clarification.

Paragraph 3.2.3, Feedwater System (Pumps P102A and P102B)
Paragraph 3.2.4, Chemical and Volume Control System (Pumps P205A and P205B)
Paragraph 3.2.5, Chemical and Volume Control System (Pumps P211A and P211B)

These pumps are tested on fixed resistance flow paths. As such, the pump differential pressure is determined and the flow rate, though not calculated, can be evaluated. Since the flow paths utilized for inservice testing are fixed resistance paths, pump differential pressure will give direct indication of pump, and therefore, flow rate degradation. In addition, Plant Technical Specifications require, for each of these pumps, that a specified discharge pressure be obtained during testing on recirculation flow. The recirculation flow path is used to enhance the repeatability of results and to provide a sound basis for comparison since the normal flow path may be subjected to different pressures, temperatures and system resistances based on the operations being performed at the time of testing. This requirement further serves to insure that the pumps are capable of meeting their design service. The attached relief requests have been revised accordingly to reflect the above clarification.

3. NRC Request:

Paragraph 4.2: This section does not request relief for the three-inch check valve located at Elevation 83 feet 11 inches in the spent fuel pool (SFP). It appears that, depending upon the elevation of the break, failure of line 10-HCC-54 combined with failure of this check valve to open could cause draining of the SFP. It also appears that inservice testing of this valve, in accordance with IWV-3520, might be difficult. Accordingly the question arises as to why relief has not been requested and/or alternate testing proposed.

In reviewing FSAR Figure 9.1-4, we note that the SFP Cooling System, including this check valve, is designated Quality Group 4A. Hence, one might consider the check valve not subject to IWV-3520. We believe, however, this is incorrect because the SFP Cooling System is not designed to Seismic Category I standards, and because it is not, FSAR Section 9.1.3.3 takes credit for operation of this check valve to prevent draining of the SFP. Therefore, based on this argument it appears that periodic testing to verify the operability of the check valve is prudent. Please address this concern.

PGE Response:

The three-inch check valve located at Elevation 83 feet 11 inches in the SFP cannot be tested using existing equipment. PGE is currently designing and fabricating a special long-handled tool to insert inside the valve to check the position of the disc. We plan to test this method by January 1, 1983. Should this method prove to be successful then the valve will be periodically tested in accordance with IWV-3520.

4. NRC Request:

Paragraphs 4.2.3.1, 4.2.4.1 and 4.2.4.2: These requests for relief appear to be based on the assumption that full-stroke testing can only be accomplished by flow testing. IWV-3522, however, specifies other methods for performing full-stroke testing, including visual observation, electrical position indication, observation of pressure differences and use of mechanical exercisers.

Please consider these other techniques in determining if full-stroke testing is impractical. If, after considering these other techniques it is still concluded that full-stroke testing of these valves is impractical, please explain the basis for your conclusions.

PGE Response:

In determining satisfactory methods by which to test these check valves, all the methods identified in IWV-3522 were evaluated. These check valves are not equipped with mechanical exercisers, electrical position indication or differential pressure instrumentation. Additionally, operation of these valves cannot be verified visually. Since these valves are all normally closed valves, flow testing will verify partial stroke testing at a minimum. The attached relief requests have been revised accordingly to reflect the above clarification.

5. NRC Request:

Paragraph 4.2.5.3: Please describe how valves (3-EBD-CK) will be "exercised to verify operability in the closed position...".

PGE Response:

These valves are tested in the closed position by applying air pressure to the steam supply line to the auxiliary feedwater pump with the main steam headers depressurized and the isolation valves upstream of each check valve closed. One isolation valve is opened and pressure and audio indications are observed for evidence that the check valve is in the closed position. This procedure is then repeated for each check valve. The attached relief request has been revised accordingly to reflect the above clarification.

6. NRC Request:

Paragraph 4.2.8.1: The basis given for requesting relief from the Section XI leakage rate measurement is that the Category A

Containment isolation valves are currently tested under the provisions of Appendix J to 10 CFR 50. While the tests performed to Appendix J are acceptable for satisfying the requirements of Section XI, IWV-3420 Valve Leak Rate Test, Appendix J does not provide for the analysis of leakage rates as specified in IWV-3426. Accordingly, please modify your request for relief to indicate that the analysis required by IWV-3426 and the corrective action required by IWV-3427 will be performed.

PGE Response:

The attached relief request has been modified to reflect that the analysis required by IWV-3426 is presently being performed at the Trojan Nuclear Plant. PGE does assign valve seat leakage criteria to each valve for trending purposes. The local leak rate coordinator has been trending valve leakage rates as demonstrated in the Trojan Refueling Outage Reports. For example, the 1982 report compares leakage data for type B&C penetrations for the last six years. Therefore, the local leak rate testing program of 10 CFR 50, Appendix J, as implemented at the Trojan Nuclear Plant does incorporate the requirements of IWV-3426.

The attached relief request has also been modified to reflect that relief is requested from IWV-3427 corrective action requirements. The acceptance criteria for the allowable leakage rate under 10 CFR 50, Appendix J, is based on total Containment leakage and not on individual valve seat leakage criteria. Therefore, corrective action for these valves is not only based on the conservatively established individual valve leakage criteria, but also on the acceptability of total Containment leakage. In light of this, valve trending data is reviewed and corrective actions taken as necessary. In many cases, valve testing has actually been occurring on an annual basis rather than every two years as required. In addition, when excessive leakage is identified in these valves, the valves are replaced or repaired and it is reported to the NRC via the Licensee Event Report system. These reports are evaluated by both the Plant Review Board and the Nuclear Operations Board to ensure that the corrective action taken was appropriate and adequate to minimize the chances of recurrence. While doubling the frequency of valve testing is not imposed in all cases, it is used as one of the corrective actions to avoid valve failures. Therefore, the corrective action requirements at Trojan are an acceptable alternative to the criteria given in ASME Section XI, Paragraph IWV-3427.

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3.2 RELIEF REQUESTS FOR PUMPS

The Code of Federal Regulations, 10 CFR 50.55a(g)(5)(iii), states that, "If the licensee has determined that conformance with certain code requirements is impractical for his facility the licensee shall notify the Commission and submit information to support his determinations."

By interpretation, testing of pumps which does not conform to the standard test requirements for measurement of specific parameters or for the frequency of performance of tests is assumed to be a nonconformance. This section identifies those pumps for which Trojan Nuclear Plant is in nonconformance with the standard test requirements and provides the basis for relief from testing and the provisions for alternate testing of those pumps when applicable.

3.2.1 SERVICE WATER SYSTEM: PUMPS P108A, P108B, P108C

Code Class: ASME VIII, Division 1

Function: The service water pumps provide cooling and makeup water for safety-related and non-safety-related equipment and systems. The pumps are also used for dilution of liquid radwaste during discharge.

Test Requirement: Measure/observe pump inlet pressure, vibration amplitude, bearing temperature, and lubricant.

Basis for Relief: "Instrumentation Not Originally Provided." ASME VIII pumps at Trojan were not required to be designed for testing for operational readiness as per 10 CFR 50.55a(g).

The pumps are totally submerged inside the Intake Structure. Pump bearings are inaccessible and the instrumentation required for measurement of pump inlet pressure, vibration amplitude, and bearing temperature was not provided in the original system design.

Alternate Testing: Inlet pressure for these pumps will be determined by measuring the Intake Structure water level.

The pumps are submerged in the Intake Structure and are not accessible for attachment of transducers for displacement measurement of vibration amplitudes during pump operation. The pump motor inboard bearing will be periodically monitored for vibration amplitude. Motor inboard bearing vibration measurements provide indication of pump shaft alignment and deterioration. The pump bearing vibration amplitude will not be measured.

The pump bearing temperature will not be measured, and the lubricant will not be observed.

3.2.2 DIESEL FUEL OIL SYSTEM: PUMPS P144A & P144B

Code Class: ASME VIII, Division 1

Function: The diesel oil transfer pumps provide flow of fuel oil from the diesel oil storage tanks to the fuel oil day tanks.

Test Requirement: Measure pump inlet pressure, differential pressure, flow rate, vibration amplitude, bearing temperature and lubricant.

Basis for Relief: "Instrumentation Not Originally Provided." ASME VIII pumps at Trojan were not required to be designed for testing for operational readiness as per 10 CFR 50.55a(g). Instrumentation was not provided for measurement of inlet pressure, differential pressure and flow rate.

"Accessibility." These pumps are located inside the diesel oil storage tanks. The pumps are inaccessible for measurement of vibration amplitude and bearing temperature.

Alternate Testing: Pump discharge pressure will be measured and the inlet pressure will be calculated from tank level and the suction head on the pump. The differential pressure will be taken as the difference between pump discharge pressure and calculated inlet pressure.

The pumps are enclosed within the diesel oil storage tanks and accessibility is not available for measuring pump vibration amplitude or bearing temperature and the lubricant cannot be observed.

The pump flow rate will be calculated from a timed rise in the fuel oil day tank level.

3.2.3 FEEDWATER SYSTEM: PUMPS P102A and P102B

Code Class: ASME VIII, Division 1

Function: The auxiliary feedwater pumps provide a backup to the normal feedwater pumps to ensure the safety of the Plant and protection of steam generators when the normal feedwater pumps are unavailable.

Test Requirement: Measure the flow rate every 3 months.

Basis for Relief: "Instrumentation Not Originally Provided." ASME Section VIII pumps at Trojan were not required to be designed for testing for operational readiness, as per 10 CFR 50.55a(g). These pumps are tested using a fixed resistance flow path (recirculation flow to the condensate storage tank) since instrumentation was not provided for measurement of flow rate in the flow path.

Alternate Testing: The inlet pressure, differential pressure, rotative speed, bearing temperature and vibration amplitude will be measured for each of these pumps. Measurement of these pump parameters will provide evidence to assess the operational readiness of these pumps. Flow rate can be adequately evaluated from the pump differential pressure measurement since a fixed resistance path is used.

3.2.4 CHEMICAL AND VOLUME CONTROL SYSTEM PUMPS P205A and P205B

Code Class: 2

Function: These pumps normally are not operating when the positive displacement charging pump is available, but in the event that the charging flow requirements exceed the capacity of the positive displacement charging pump, one of these pumps is put online and the positive displacement charging pump is shut down. During a Loss-of-Coolant Accident, both of these pumps operate as part of the Safety Injection System.

Test Requirement: Measure the flow rate every 3 months.

Basis for Relief: "Instrumentation Not Provided." Class 2 pumps at Trojan were not required to be designed for testing for operational readiness as per 10 CFR 50.55a(g). These pumps are tested using a fixed resistance flow path (recirculation flow to the refueling water storage tank) since instrumentation was not provided for measurement of flow rate.

Alternate Testing: The inlet pressure, differential pressure, bearing temperature and vibration amplitude will be measured for each of these pumps. Measurement of these pump parameters will provide evidence to assess the operational readiness of these pumps. Flow rate can be adequately evaluated from the pump differential pressure measurement since a fixed resistance path is used.

3.2.5 CHEMICAL AND VOLUME CONTROL SYSTEM: PUMPS P211A and P211B

Code Class: 3

Function: Normally, one of these pumps is aligned with one boric acid tank and starts on demand from the reactor makeup control system. Emergency boration, the supplying of 4-wt% boric acid solution to the suction of the charging pumps, can be accomplished by either/or both of these pumps. These pumps are also used to transfer 4-wt% boric acid solution from the batching tank to the boric acid tanks.

Test Requirement: Measure the flow rate every 3 months.

Basis for Relief: "Instrumentation Not Provided." Class 3 pumps at Trojan were not required to be designed for testing for operational readiness as per 10 CFR 50.55a(g). These pumps are tested using a fixed resistance flow path (recirculation flow to the boric acid tanks) since instrumentation was not provided for measurement of flow rate.

Alternate Testing: The inlet pressure, differential pressure, bearing temperature and vibration amplitude will be measured for each of these pumps. Measurement of these pump parameters will provide evidence to assess the operational readiness of these pumps. Flow rate can be evaluated from the pump differential pressure measurement since a fixed resistance path is used.

4.2 RELIEF REQUESTS FOR VALVES

The Code of Federal Regulations, 10 CFR 50.55a(g)(5)(iii), requires that "If the licensee has determined that conformance with certain code requirements is impractical for his facility the licensee shall notify the Commission and submit information to support his determinations."

By interpretation, any valves which do not conform to the standard test requirements for measurement of specific parameters or for the frequency of the test are assumed to be in nonconformance. This section identifies those valves for which testing under this program does not comply with the standard test requirements and provides the bases for relief from testing and provisions for alternate testing.

4.2.1 REACTOR COOLANT SYSTEM

4.2.1.1 Valves: 8046 and 8047

Category: AC

Class: 2

Function: These valves are internal Containment isolation valves which prevent backflow of Containment/pressurizer relief tank contents under accident conditions.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: These valves cannot be verified shut during power operation because the test connections are located inside the Containment. The only available method to verify valve closure is during leak rate testing during refueling outages.

Alternate Testing: These valves will be exercised for verification of operability during each refueling.

4.2.2 RESIDUAL HEAT REMOVAL SYSTEM

4.2.2.1 Valve: 8958

Category: C

Class: 2

Function: This valve prevents backflow from RHR suction header to the refueling water storage tank.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: Exercising this valve requires the RHR pumps drawing suction on the RWST. Operating modes do not allow this because there is no place to store the water unless initiating large scale RWST recirculation (opening manual valve 8735). However, this is not feasible due to the RHR System operating in a degraded condition. Cold shutdown is not feasible because the RHR is in circulation to the RCS. The only feasible Plant condition for which this valve can be exercised is during refueling when the RHR System is utilized to fill the refueling cavity.

Alternate Testing: This valve will be full-stroke exercised during refueling outages when the refueling cavity is being filled.

4.2.2.2 Valves: HCV-606 and HCV-607

Category: B

Class: 2

Function: These valves permit remote control of flow through the heat exchangers.

Test Requirement: Exercise to measure stroke time every 3 months.

Basis for Relief: These valves are remotely controlled for opening and closing by manual adjustment of a potentiometer. The stroke times of these valves are dependent on how fast the operator adjusts the potentiometers that control the valves' opening and closing.

Alternate Testing: These valves will be tested to verify smooth operation over their full range every 3 months.

4.2.3 SAFETY INJECTION SYSTEM

4.2.3.1 Valves: 8956A, 8956B, 8956C, and 8956D

Category: AC

Class: 1

Function: These normally-closed valves prevent backflow from the RCS into the accumulators during normal operation.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: During normal operation, the accumulator cannot overcome RCS pressure. Full-stroke testing is not feasible due to limited Plant conditions for testing. These valves are not equipped with mechanical exercisers, electrical position indication, or differential pressure instrumentation and cannot be observed visually.

Alternate Testing: These valves will be partial-stroke exercised during cold shutdown.

4.2.3.2 Valve: 8968

Category: AC

Class: 2

Function: This internal isolation valve prevents backflow out of the Containment from the accumulators and is on the nitrogen overpressure supply line.

Test Requirements: Exercise for operability every 3 months.

Basis for Relief: There are no provisions for verifying the valve to be in the shut position during normal operation.

Alternate Testing: This valve will be exercised and verified shut during leak rate testing at refueling outages.

4.2.3.3 Valves: MO-8803A and MO-8803B

Category: B

Class: 2

Function: These valves isolate the boron injection tank from the charging pumps during normal operation. These valves are interlocked to open on a safety injection signal.

Test Requirements: Exercise for operability every 3 months.

Basis for Relief: When the positive displacement charging pump (P-217) is inoperable, the centrifugal pumps are run to provide normal charging flow. Exercising these valves while the centrifugal charging pumps are operating will dilute the boron injection tank (BIT) concentration and/or subject the BIT to a pressure shock.

There is a specified number of design pressure shocks for the BIT, and a low limit for operability for boron concentration.

Alternate Testing: These valves will be full-stroke exercised with the Plant in Modes 4, 5, or 6 when these valves are not testable in Modes 1, 2, or 3. Otherwise, they will be exercised for operability every 3 months.

4.2.4 CONTAINMENT SPRAY SYSTEM

4.2.4.1 Valves: 10-HCB-CK (two)

Category: C

Class: 2

Function: These valves prevent backflow of air from the Containment atmosphere through the Containment spray ring header.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: These valves do not have provision for testing under normal conditions. Exercising the valves would require injection of the test medium into the Containment through the spray nozzles with no means available for verification of flow. Equipment damage and requirements for extensive cleanup of the Containment would result. These valves are not equipped with mechanical exercisers, electrical position indication or differential pressure instrumentation and cannot be observed visually.

Alternate Testing: These valves are partial-stroke exercised during Containment air flow testing at a maximum interval of 5 yr under Technical Specification 4.6.2.1.

4.2.4.2 Valves: 14-HCB-CK (two)

Category: C

Class: 2

Function: These valves prevent backflow into the RWST from the Containment spray suction header.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: Full-stroke exercising of these valves would require injection of the test medium into the Containment. Equipment damage and requirements for extensive cleanup of the Containment would result. These valves are not equipped with mechanical exercisers, electrical position indication or differential pressure instrumentation and cannot be observed visually.

Alternate Testing: These valves will be partial-stroke exercised with flow through the Containment spray pump miniflow lines every 3 months.

4.2.5 MAIN STEAM SYSTEM

4.2.5.1 Valves: CV-2210, CV-2230, CV-2250, and CV-2270

Category: BC

Class: 2

Function: These valves prevent reaching the safety valve setpoint during transients and dissipate reactor decay heat to the atmosphere if the main condenser is not available.

Test Requirement: Exercise to measure stroke time every 3 months.

Basis for Relief: Testing these valves every 3 months increases the normal number of times each valve opens against a differential pressure, thus deteriorating the valve seat and increasing the likelihood of causing leakage. These valves are remotely controlled for opening and closing by manual adjustment of a controller. The stroke times of these valves are dependent on how the controller is calibrated.

Alternate Testing: These valves will be exercised to verify smooth operation only over their full range during cold shutdown.

4.2.5.2 Valves: 28-EBB-CK (four)

Category: C

Class: 2

Function: These valves perform an accident-related function in that they are required to close in the event of a steam line break in Containment in order to prevent blowing down of more than one steam generator to Containment.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: During normal operation, the main steam pressure cannot be overcome, and as a result these valves cannot be exercised.

Alternate Testing: These valves will be full-stroke exercised for verification of operability during refueling.

4.2.5.3 Valves: 3-EBD-CK (four)

Category: C

Class: ANSI B31.1

Function: These valves prevent backflow from the steam turbine-driven auxiliary feedwater pump to the mainsteam lines.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: There are no provisions for verifying that the valve is in the shut position during normal operation.

Alternate Testing: These valves will be checked every 3 months to verify that they are in the open position and will be verified operable in the closed position at each refueling outage by testing with air pressure.

4.2.6 CLEAN RADIOACTIVE WASTE SYSTEM

4.2.6.1 Valve: 1-GBB-CK

Category: AC

Class: 2

Function: This valve is a Containment isolation valve for the N_2 supply line to the reactor coolant drain tank and prevents backflow out of Containment.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: The valve can only be verified in the closed position during leak rate testing at refueling outage.

Alternate Testing: Exercise for operability at each refueling outage.

4.2.7 INSTRUMENT AND SERVICE AIR SYSTEM

4.2.7.1 Valves: CV-4471 and 2-HBE-CK (two)

Category: A and AC, respectively

Class: 2

Function: These normally-open series valves are Containment isolation valves for the instrument air supply to pneumatic valves and instrumentation inside the Containment. The valves close on receipt of a Containment isolation signal.

Test Requirement: Exercise for operability every 3 months.

Basis for Relief: Failure of either of these valves in a closed position removes the air supply to the Containment air-operated valves and pneumatic instrumentation. Valve 2-HBE-CK can only be verified shut during leak testing at refueling outages.

Alternate Testing: These valves will be full-stroke exercised for verification of operability during leak rate testing at refueling.

4.2.8 GENERIC RELIEF REQUESTS

4.2.8.1 Valves: Containment Isolation Valves

Category: A

Class: 1 and 2

Function: These valves provide Containment isolation during reactor operation and/or isolate the Containment to prevent the release of radioactive products following a design accident.

Test Requirement: Test for seat leakage rate shall be conducted at least once every two years.

Basis for Relief: The Containment isolation valves are tested for seat leakage under the criteria of Appendix J to 10 CFR 50. These valves are tested and analyzed for seat tightness in accordance with the Trojan Nuclear Plant "Containment Local Leak Rate Test". This procedure provides for local leak rate testing of valves. The acceptance criteria for allowable leakage rate under Appendix J to 10 CFR 50 varies from the acceptance criteria of Subsection IWV of ASME, Section XI, in that the allowed leakage is based on the total Containment leakage rate rather than on individual valve seat leakage criteria. This test program provides adequate documentation and individual analysis for valves to verify maintenance of Containment integrity. Failure of any valve to provide adequate seat tightness in maintaining Containment integrity will require corrective action for repair and replacement of the valve. Therefore, the 10 CFR 50, Appendix J requirements and the corrective actions of Plant procedures are adequate in lieu of IWV-3420 and IWV-3427 requirements. Individual valve leakage rate requirements are assigned and actual leakage rates are compared with previous measurements which is in agreement with the requirements of IWV-3426.

Alternate Testing: These valves are tested for seat leakage rate during local leakage rate testing in accordance with Appendix J to 10 CFR 50 and will not be tested under this program. Individual valve leakage rate criteria is specified by the owner in accordance with IWV-3426 and corrective actions will be taken in accordance with Plant Procedures.

4.2.8.2 Valves: Valves Designated for Review Under the Criteria for Appendix J to 10 CFR 50

These valves were identified by NRC staff during the preliminary meeting for resolving IST comments and are being reviewed by the NRC for applicability to Appendix J Containment boundary criteria. The valves have been included within this program for administrative documentation only. Testing of these valves will be reevaluated upon completion of the NRC review.