**COMPANY** South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

> June 21, 1994 ST-HL-AE-4797 File No.: G09.16 10CFR50.55a

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

**The Light** 

South Texas Project Unit 1 and Unit 2 Docket Nos. STN 50-498 and 50-499 Request for Relief from ASME Boiler and Pressure Vessel Code Section XI Pump Relief Request No. RR-13 (Unit 1) and Pump Relief Request Nos. RR-12 and RR-13 (Unit 2)

In accordance with 10CFR50.55A(g), Houston Lighting & Power Company (HL&P) submits Pump Relief Request (RR) RR-13 for Unit 1 and RR-12 and RR-13 for Unit 2 to use permanently installed instrumentation as an alternate testing instrument. Upon NRC approval of these relief requests, HL&P will commence using this permanently installed instrumentation for inservice testing of the applicable pumps and will revise the South Texas Project Unit 1 and Unit 2 Pump and Valve Inservice Test Plans.

Should you have any questions, please contact Mr. W. Roger Harris at site extension (512) 972-8475 or me at (512) 972-8787.

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Attachment 1: Pump Relief Request 13 (Unit 1) Attachment 2: Pump Relief Request 12 (Unit 2) Attachment 3: Pump Relief Request 13 (Unit 2)

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MISC-94/98-101.00Project Manager on Behalf of the Participants in the South Texas Project

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Unit 1 Pump and Valve Inservice Test Plan (Rev 6)

PUMP RELIEF REQUEST 13

System: Component Cooling Water

Components: Component cooling water pumps 1A, 1B & 1C

<u>Component Function:</u> Provide cooling water for removal of heat from Engineered Safety Features.

<u>Code Requirement:</u> IWP-4110 and IWP-4120 for pressure instrumentation accuracy and full-scale range.

# Basis for Relief:

The installed suction pressure gauges for the component cooling water pumps have a range of 160 psig and an accuracy of 0.5%. The reference values for suction pressure for these pumps have been as low as 21 psig. The ASME Code requires each analog instrument to have a full-scale range 3 times the reference value or less and an accuracy of  $\pm$  2 percent of full-scale. The installed suction pressure gauges for these component cooling water pumps has a full-scale range greater than 3 times the reference value, but has an accuracy of  $\pm$  0.5 percent which is more conservative than the Code. The combination of the range and accuracy of the installed suction pressure gauge yields a reading at least equivalent to the reading achieved from instruments that meet the Code requirements. The installed suction pressure gauge meets the intent of the Code requirements and yields an acceptable level of quality and safety for testing.

### Alternate Testing

The permanently installed suction gauges for component cooling water pumps 1A,1B & 1C will be used to obtain test measurements for evaluating pump operability.

MISC-94\94-171.002

Attachment 2 ST-HL-AE-4797 Page 1 of 1

Unit 2 Pump and Valve Inservice Test Plan (Rev 4)

### PUMP RELIEF REQUEST 12

System: Component Cooling Water

Components: Component cooling water pumps 2A, 2B & 2C

<u>Component Function:</u> Provide cooling water for removal of heat from Engineered Safety Features.

<u>Code Requirement:</u> IWP-4110 and IWP-4120 for pressure instrumentation accuracy and full-scale range.

### Basis for Relief:

The installed suction pressure gauges for the component cooling water pumps have a range of 160 psig and an accuracy of 0.5%. The reference values for suction pressure for these pumps have been as low as 20 psig. The ASME Code requires each analog instrument to have a full-scale range 3 times the reference value or less and an accuracy of  $\pm$  2 percent of full-scale. The installed suction pressure gauges for these component cooling water pumps has a full-scale range greater than 3 times the reference value, but has an accuracy of  $\pm$  0.5 percent which is more conservative than the Code. The combination of the range and accuracy of the installed suction pressure gauge yields a reading at least equivalent to the reading achieved from instruments that meet the Code requirements. The installed suction pressure gauge meets the intent of the Code requirements and yields an acceptable level of quality and safety for testing.

### Alternate Testing

The permanently installed suction gauges for component cooling water pumps 2A,2B & 2C will be used to obtain test measurements for evaluating pump operability.

MISC-94\94-171.002

Attachment 3 ST-HL-AE-4794 Page 1 of 1

Unit 2 Pump and Valve Inservice Test Plan (Rev 4)

PUMP RELIEF REQUEST 13

System: Essential Cooling Water System

<u>Components</u>: Essential cooling water screen wash booster pumps 2A, 2B & 2C

<u>Component Function:</u> Provide water at high pressure to backwash debris off the traveling screens located at the essential cooling water pump suction inlet from the essential cooling pond.

<u>Code Requirement:</u> IWP 4110 and IWP-4120 for pressure instrumentation accuracy and full-scale range.

### Basis for Relief:

The installed discharge pressure gauges for essential cooling water screen wash booster pumps 2A, 2B & 2C have a range of 300 psig and an accuracy of 0.5%. The reference values for discharge pressure for these pumps have been as low s 87 psig. The ASME Code requires each analog instrument to  $h_{\rm c}$  a full-scale range 3 times the reference value or less and an acc icy of  $\pm$  2 percent of fullscale. The installed discharge pressure gauges for these essential cooling water screen wash booster pumps have a full-scale range greater than 3 times the reference value, but has an accuracy of + 0.5 percent which is more conservative than the Code. The combination of the range and accuracy of the installed discharge pressure gauge yields a reading at least equivalent to the reading achieved from instruments that meet the Code requirements. The installed discharge pressure gauge meets the intent of the Code requirements and yields an acceptable level of quality and safety for testing.

# Alternate Testing

The permanently installed discharges gauges for essential cooling water screen wash booster pumps 2A, 2B & 2C will be used to obtain test measurements for evaluating pump operability.