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POWER COMPANY

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U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Attention: Mr. R. B. Samworth
Senior Project Manager
Project Directorate III-3

Gentlemen:

DOCKETS 50-266 AND 50-301
IN-SERVICE INSPECTION PUMP AND VALVE PROGRAM
REQUEST FOR RELIEF (PUMPS)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Enclosed is a change to our Pump and Valve In-Service Test Program. The change is an additional request for relief for pump testing for those pumps which are tested using the normal operating system.

It is our understanding, based on the contents of NRC Generic Letter 89-04 and the regional follow-up meetings, that requests for relief require NRC approval prior to placing them into practice. Because we have no installed method by which to precisely control flow for the affected system, we will implement the enclosed request immediately. Immediate implementation will allow us to eliminate declarations of pump inoperability for which ASME Section XI has no guidance or corrective action.

Sincerely,

James J. Zach
Vice President
Nuclear power

Enclosure

Copy to Adele DiBiasio, Brookhaven National Laboratory

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RELIEF REQUEST PRR-19

Components

Component Cooling Water Pumps 1P-11 A and B, 2P-11 A and B
Service Water Pumps P-32A, P-32B, P-32C, P-32D, P-32E, P-32F

Section XI Requirement

Reference values are defined as one or more fixed sets of values of the quantities shown in Table IWP-3100-1, as measured or observed when the equipment is known to be operating acceptably. (IWP-3110)

Basis for Relief

The component cooling water pumps and service water pumps are tested in-situ. These systems contain numerous components which use temperature control valves which automatically adjust position (thereby pump discharge flow) in response to sensed temperature. This manner of operation prevents the setting and maintaining of a single, specific reference value.

Alternate Testing

The "reference value" for these pumps shall be a loci of values located on either side of a specific value. The range of the upper and lower limits of the reference values shall be small enough to provide adequate assessment of equipment operation.

The tolerance around the selected value shall be ±2 percent.