

JUL 24 1984

DCS MS-014

Docket Nos. 50-338
and 50-339

Mr. W. L. Stewart
Vice President - Nuclear Operations
Virginia Electric and Power Company
Post Office Box 26666
Richmond, Virginia 23261

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Dear Mr. Stewart:

SUBJECT: REQUEST FOR SITE VISIT CONCERNING STAFF PREPARATION OF PUMP
AND VALVE INSERVICE TESTING (IST) SAFETY EVALUATION REPORT/
NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2 (NA-1&2)

We are reviewing your submittals related to NA-1&2 pump and valve inservice testing.

We request that you review the enclosed questions and plan to meet with the staff at the NA site to further discuss your IST program. The enclosure will serve as an agenda for the site meeting. After approximately four weeks, we request that you contact your NRR project manager and confirm a time and date mutually agreeable to parties concerned.

The information requested in this letter affects fewer than 10 respondents; therefore OMB clearance is not required under P.L. 96-511.

Sincerely,

Original Signed by *J. R. Miller*

James R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure: Request for
Additional Information

cc w/enclosure:
See next page

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PDR ADOCK 05000338
P PDR

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|-----------|------------|-----------|----------|--|--|--|--|
| OFFICE ▶ | ORB#3:DL | ORB#3:DL | ORB#3:DL | | | | |
| SURNAME ▶ | PMKreutzer | LEngle/pn | JRMiller | | | | |
| DATE ▶ | 7/20/84 | 7/20/84 | 7/20/84 | | | | |

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VALVESA. General Comments and Questions

1. It is the current NRC position that if a licensee is utilizing the 1974 Edition through the Summer 1975 Addenda of the ASME Code, Section XI, they should include all applicable Category E valves in their IST program valve listing in accordance with the requirements of IWV-3700.
2. The limiting value of full stroke time of each power operated valve should be included in the IST program valve listing.
3. Are all valves that receive a Type C, Appendix J, leak test included in the IST program as either Category A or A/C valves?
4. Are all check valves, included in the IST program, full-stroke exercised unless specific relief has been requested?
5. Provide a list of all valves that are leak tested to demonstrate their pressure boundary isolation function.
6. Specific relief should be requested for not exercising Category A/E valves. Are all of the Category A/E valves that are included in the IST program locked or sealed closed?
7. A more detailed relief request should be submitted for any valves identified for cold shutdown exercising that may not be able to be exercised during cold shutdowns due to plant conditions, such as having to maintain containment vacuum or being unable to secure a pump. Refer to Section 3.2 of the valve portion of the IST program.

B. Chemical and Volume Control System

- i. Are valves 1-CH-254, 267, and 279 full-stroke exercised quarterly?

2. Why were valves 1-CH-336, 358, and 380 changed from Category A/C to C?
3. Are valves 1-CH-310, 314, and 318 locked or sealed in position?
4. Review the safety function of valves HCV-1311 and 1-CH-328 (auxiliary spray line isolation and check valve) to determine if they should be included in the IST program.

C. Emergency Diesel Air Services

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

| <u>Category B</u> | | <u>Category C</u> |
|-------------------|---------|-------------------|
| 1-EB-1 | 1-EB-20 | 1-EB-41 |
| 1-EB-2 | 1-EB-21 | 1-EB-53 |
| 1-EB-3 | 1-EB-22 | 1-EB-72 |
| 1-EB-4 | 1-EB-23 | 1-EB-91 |
| 1-EB-5 | 1-EB-24 | 1-EB-15 |
| 1-EB-6 | 1-EB-25 | 1-EB-34 |
| 1-EB-7 | 1-EB-26 | 1-EB-65 |
| 1-EB-8 | 1-EB-27 | 1-EB-84 |
| 1-EB-9 | 1-EB-28 | |
| 1-EB-10 | 1-EB-29 | |
| 1-EB-11 | 1-EB-30 | |
| 1-EB-12 | 1-EB-31 | |

D. Interior Fire Protection Hose Rack System

1. What safety function does valve 1-FP-272 perform?
2. Are valves 1-FP-274 and 1-FP-275 locked closed?

E. Feedwater System

1. Is valve HCV-FW-100C fail-safe tested in accordance with the requirements of Section XI?

2. Provide a more detailed technical justification for not verifying closure of valves 1-FW-047, 1-FW-079, and 1-FW-111 during cold shutdowns.
3. Does exercising the following valves during power operation result in excess thermal shock to the feedwater nozzles or associated piping?

| | | |
|----------|----------|----------|
| 1-FW-68 | 1-FW-148 | 1-FW-93 |
| 1-FW-100 | 1-FW-165 | 1-FW-127 |
| 1-FW-132 | 1-FW-183 | 1-FW-279 |

F. Containment Atmosphere Cleanup System

1. Are valves TV-HC-109A and 109B fail-safe tested in accordance with the requirements of Section XI?
2. Is the valve number for the containment atmosphere purge blower discharge check valve 1-HC-006 (as indicated in the valve listing) or 1-HC-005 (as indicated on P&ID 11715.FM.106A)?

G. Main Steam System

1. What is the safety function of valves 1-MS-19, 58, and 96?
2. Review the safety function of valves PCV-MS-101A, B, and C to determine if they should be included in the IST program.

H. Quench Spray System

1. How are valves 1-QS-11 and 19 full-stroke exercised during cold shutdowns?

I. Containment Recirculation Spray System

1. Why were valves MOV-RS-155A&B and MOV-RS-156A&B changed from Category B to Category A/B?
2. How are valves 1-RS-18 and 27 full-stroke exercised during cold shutdowns?

3. Provide the specific technical justification for not full-stroke exercising valves 1-RS-123 and 138 during cold shutdowns. How are these valves full-stroke exercised during refueling outages?

J. Residual Heat Removal System

1. Why were valves MOV-1700, MOV-1701, MOV-1720A, and MOV-1720B changed from Category A to Category B?

K. Safety Injection System

1. Do valves MOV-1860A and B perform a containment isolation function?
2. Are valves MOV-1867C, MOV-1867D, and 1-SI-77 exercised during each cold shutdown, or only during the cold shutdowns that require a pressure boundary isolation valve leak test (i.e. cold shutdowns that are greater than 72 hours)?
3. Provide a more detailed technical justification for not full-stroke exercising valves 1-SI-9 and 1-SI-26 during cold shutdowns.
4. Is valve 1-SI-18 full-stroke exercised during the quarterly testing?
5. Is check valve 1-SI-47 full-stroke exercised during cold shutdowns?
6. How is check valve 1-SI-66 being verified closed (its safety position) quarterly?
7. Are the safety injection accumulator discharge check valves (1-SI-125, 127, 142, 144, 159, and 161) full-stroke exercised open during cold shutdowns? Are these valves being leak tested to demonstrate their pressure boundary isolation function?
8. Provide a more detailed technical justification for not full-stroke exercising the valves listed in relief request SI-Note-09 during power operation and cold shutdowns. Identify the listed valves that are leak tested to demonstrate a pressure boundary isolation function. Identify the listed valves that are leak tested to demonstrate a containment isolation function.

9. Do valves 1-SI-209, 211, and 213 perform a pressure boundary isolation function?
 10. Valve 1-SI-97 is included in the valve list for relief request SI-Note-09, but does not appear in the valve listing of the IST program. Is the relief request valve listing or the IST program valve listing in error?
 11. Review the categorization of valves 1-SI-305 and 306 to determine if they should be categorized "E" rather than "B/E".
 12. Provide P&ID FM-35A for our review at the working meeting.
- L. Service Water System
1. Why were valves 1-SW-120, 130, 140, and 150 changed from Category "A/C" to "C"?
- M. Chemical Feed System
1. Review the categorization of valves 1-WT-351, 354, and 357 to determine if they should be categorized "E" rather than "B/E".
 2. Are valves 1-WT-465, 468, 488, 491, 511, and 514 locked or sealed in position?

PUMPS

1. Since the 1974 Edition through the Summer 1975 Addenda of the ASME Code, Section XI is being utilized for pump testing, a specific relief request should be submitted for performing the periodic testing at any interval other than the monthly interval that is specified in the Code.
2. Will post-maintenance testing be performed within 96 hours after return of the pump to normal service as required by IWP-3111? Refer to Section 2.2 of the IST program.
3. What alternate testing methods have been considered for determining the mechanical condition of the boric acid transfer pumps, since bearing temperature and pump vibration are not being measured?
4. What alternate testing methods have been considered for determining the hydraulic and mechanical condition of the emergency diesel generator fuel oil pumps?
5. Why was the spent fuel pit pump (1-FC-P-1A) deleted from the IST program?
6. Is operability of the RHR system necessary to meet the requirements of Branch Technical Position RSB 5-1 of NUREG-0800?
7. What alternate testing methods have been considered for determining the hydraulic and mechanical condition of the inside recirculation pumps?
8. Section IWP-4310 of the 1974 Edition through the Summer 1975 Addenda of the ASME B&PV Code, Section XI, does not establish exception to the measurement of bearing temperature for bearings within the main flow path; therefore, specific relief should be requested for each pump that bearing temperature is not being measured since the bearings are in the main flow path.

9. Provide the specific technical justification for not testing the outside recirculation spray pumps utilizing their recirculation flow path at the Code-specified frequency.
10. What alternate testing methods have been considered for determining the hydraulic and mechanical condition of the service water radiation monitoring pumps?