



Commonwealth Edison

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August 7, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Pump and Valve Inservice Testing Plan
NRC Docket Nos. 50-373 and 50-374

- References (a): C. W. Schroeder letter to A. Schwencer
dated February 18, 1983.
- (b): C. W. Schroeder letter to H. R. Denton
dated August 2, 1983.
- (c): C. W. Schroeder letter to H. R. Denton
dated November 12, 1983.

Dear Mr. Denton:

Enclosed are revisions to the LaSalle County Units 1 and 2 Pump and Valve Inservice Testing Plans. These revisions consist of relief requests from certain ASME Section XI Code requirements for two specific valves. These forms also contain the bases for these requests.

Relief Request RI-19 is applicable to both Units 1 and 2.
Insert into Part A, Tab 6 of the plan (one page).

Relief Request RV-38 is applicable to Unit 1 only. Insert into
Part B, Tab 7 of the Unit 1 plan (three pages).

One signed original and ten (10) copies of this letter and addendum are provided for NRC use and update of your pump and valve inservice testing plans.

If there are any questions on this matter, please contact this office.

Very truly yours,

J. G. Marshall
Nuclear Licensing Administrator

lm

cc: NRC Resident Inspector - LSCS 1/0
Dr. A. Bournia - 1/0

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Unit 1

RELIEF REQUEST 00	SYSTEM OR COMPONENT 01	CLASS 02	CATEGORY AND ITEM NUMBER 03	EXEMPTED COMPONENT 04	SECTION XI TEST REQUIREMENT 05	BASIS FOR RELIEF 06	ALTERNATIVE TEST 07
RI-19	Normally Closed Containment Isolation Class 1 Gate Valves Located at a High Pressure Piping/Low Pressure Piping Interface	1	Cat. B-P B15.70 B15.71	Pressure Retaining Bonnet Flange Assembly E12-F008	Leakage or Hydro-static Pressure Test	The design of these gate valves makes it impossible for the bonnet flange connection to be pressure tested at reactor pressure or higher while the valve disk is in a closed position. Pressure testing at reactor pressure with the disk in an open position is not possible because these valves are located at the interface of low pressure and high pressure piping. Therefore, the bonnet flange connection cannot be tested at a higher pressure than is allowable in the low pressure piping without causing possible damage to this piping.	Following valve maintenance operations when the bonnet is removed a VT-2 exam will be performed at the operating pressure of the low pressure piping with the valve disk in an open position. During routine ASME Section XI system pressure tests the bonnet flange connection will be subjected to the same pressure as exists in the low pressure piping.

ADY 1/1

GE-18



Unit 2

RELIEF REQUEST 00	SYSTEM OR COMPONENT 01	CLASS 02	CATEGORY AND ITEM NUMBER 03	EXEMPTED COMPONENT 04	SECTION XI TEST REQUIREMENT 05	BASIS FOR RELIEF 06	ALTERNATIVE TEST 07
RI-19	Normally Closed Containment Isolation Class 1 Gate Valves Located at a High Pressure Piping/Low Pressure Piping Interface	1	Cat. B-P B15.70 B15.71	Pressure Retaining Bonnet Flange Assembly E12-F008	Leakage or Hydro-static Pressure Test	The design of these gate valves makes it impossible for the bonnet flange connection to be pressure tested at reactor pressure or higher while the valve disk is in a closed position. Pressure testing at reactor pressure with the disk in an open position is not possible because these valves are located at the interface of low pressure and high pressure piping. Therefore, the bonnet flange connection cannot be tested at a higher pressure than is allowable in the low pressure piping without causing possible damage to this piping.	Following valve maintenance operations when the bonnet is removed a VT-2 exam will be performed at the operating pressure of the low pressure piping with the valve disk in an open position. During routine ASME Section XI system pressure tests the bonnet flange connection will be subjected to the same pressure as exists in the low pressure piping.

GE-18



PUMP & VALVE TESTING
RELIEF REQUESTS

Unit 1

RELIEF REQUEST 00	PUMP OR VALVE NO. 01	CLASS/ CATEGORY 02	FUNCTION 03	ASME SECTION XI TEST REQUIREMENT 04	BASIS FOR RELIEF 05	ALTERNATIVE TEST 06
RV-38	1E51-F065	1/C	RCIC INJECTION OUT-BOARD TESTABLE CHECK VALVE	EXERCISE QUARTERLY	DUE TO NORMAL LEAKAGE THROUGH RCIC INBOARD CHECK VALVE 1E51-F066 IT IS POSSIBLE DURING REACTOR POWER OPERATION THAT A PRESSURE APPROACHING 1000 PSIG MAY EXIST ON THE INBOARD SIDE OF TESTABLE CHECK VALVE 1E51-F065. EXERCISING VALVE F065 USING THE TEST OPERATOR REQUIRES REDUCING THE ΔP ACROSS THE VALVE DISK BY OPENING THE WARM-UP BY-PASS VALVE 1E51-F354. THIS INTRODUCES THE HIGH REACTOR PRESSURE TO THE UPSTREAM SIDE OF STOP VALVE 1E51-F013. ONE PURPOSE OF F013 IS TO ISOLATE REACTOR PRESSURE FROM THE RCIC PIPING WHICH IS NORMALLY PRESSURIZED TO 60 PSIG. INADVERTANT OPENING OR EXCESSIVE LEAKAGE THROUGH F013 WOULD RESULT IN A WATER HAMMER OF THE RCIC PIPING AND/OR DAMAGE TO THE LOW PRESSURE PIPING ON THE SUCTION SIDE	EXERCISE DURING COLD SHUTDOWN

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**PUMP & VALVE TESTING
RELIEF REQUESTS**

unit 1

RELIEF REQUEST 00	PUMP OR VALVE NO. 01	CLASS/ CATEGORY 02	FUNCTION 03	ASME SECTION XI TEST REQUIREMENT 04	BASIS FOR RELIEF 05	ALTERNATIVE TEST 06
					OF THE RCIC PUMP WHICH IS DESIGNED FOR A MAXIMUM PRESSURE OF 100 PSIG. RELIEF IS REQUESTED TO EXERCISE RCIC OUTBOARD CHECK VALVE 1E51-F065 AT COLD SHUTDOWN WHEN REACTOR PRESSURE IS SUBSTANTIALLY REDUCED.	



Commonwealth Edison
LaSalle County Nuclear Station Unit 1

INSERVICE TESTING PLAN

VALVES
Unit 1

System RI-Reactor Core Isolation Coolant
Page 3 of 4

00	01	02	03	04	05	06	07	08	09	10	11	12	13
VALVE NO.	SIZE	P&ID NO.	COORDINATES	CLASS/CATEGORY	VALVE TYPE	ACTUATOR TYPE	VALVE POSITION	TEST	TEST SCHEDULE	MAX. STROKE TIME	RELIEF REQUEST	ACT. OR PASSIVE	REMARKS
1E51-F063	10	101-1	E8	1/A	GT	MO	O	FS,ST LT PIT	CS RR RR	15	RV-31 RV-19	A	Steam Supply Inboard Isolation (M-15) (See Note 1,4,6)
1E51-F064	10	101-1	E7	1/A	GT	MO	C	FS,ST LT	CS RR	15	RV-15 RV-19	A	Steam Supply Inboard Isolation (To RHR) (M-15) (See Note 1,4)
1E51-F065	6	101-2	C7	1/C	CV	AO	C	E PIT LT	CS RR RR		RV-19 RV-38	A	RCIC Injection Outboard Testable Check (M-29) (See Note 5,7)
1E51-F066	6	101-2	CB	1/C	CV	AO	C	E PIT LT	CS RR RR		RV-19 RV-35	A	RCIC Injection Inboard Testable Check (M-29) (See Note 5,7)
1E51-F068	10	101-1	B7	2/A	GT	MO	O	FS,ST LT	Q RR	55	RV-19	A	Turbine Exhaust Isolation (M-76) (See Note 4,6)
1E51-F069	1.25	101-1	B7	2/A	GB	MO	O	FS,ST LT	Q RR	20.6	RV-19	A	Barometric Condenser Vacuum Pump Discharge Stop (M-81) (See Note 4,6)
1E51-F076	1	101-1	E8	1/A	GB	MO	C	FS,ST LT PIT	Q RR RR	15	RV-19	A	Steam Supply Inboard Isolation Valve Warm-Up Bypass (M-15) (See Note 4,6)