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March 31, 1992

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

Subject: Beaver Valley Power Station, Unit 2
Docket No. 50-412, License No. NPF-73
Updated Inservice Testing (IST) Program, Issue 1, Revision 9

The purpose of this submittal is to provide the NRC with an informational copy of revisions to the Beaver Valley Unit 2 IST program.

Enclosure 2 contains the Issue 1, Revision 9 changes which are to be inserted in your copy of the Unit No. 2 IST Program. It has been determined that these changes do not require prior NRC approval. This is based on the determination that the changes are either:

- editorial in nature, or
- based on NRC recommendations in the Safety Evaluation Report for Proposed Revision 2A which the NRC approved on December 27, 1991, or
- in compliance with the 1983 Edition through Summer 1983 Addenda of the ASME XI Code, and in compliance with the positions delineated in Attachment 1 of Generic Letter 89-04.

Enclosure 1 provides a summary of the IST program changes which have been incorporated into Revision 9.

If you have any questions regarding this submittal, please contact Mr. Steve Sovick at (412) 393-5211.

Sincerely,

J. D. Sieber

Enclosures

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. A. W. DeAgazio, Project Manager
Mr. M. L. Bowling (VEPCO)

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ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV. 9)

1) Added NRC approved Pump Relief Request No. 6 (page 40) for the Chemical Injection Pumps [2QSS*P24A and B] following NRC approval of Proposed Revision 2A for the Unit 2 IST Program. The relief request permits using pump discharge pressure (Pd) and flowrate (Q) for trending pump performance in lieu of pump delta-p (ΔP). Pump suction pressure (Pi) will no longer be required. The Pump Testing Outline Sheets on pages 17 and 18 were also revised to reflect the relief requests alternate method of testing for each pump.

2) Added additional details to the Pump Testing Outline Sheets for the Fuel Oil Transfer Pumps [2EGF*P21A-D] (pages 32 - 35). Noted that no instrumentation is provided for flow, and that the level change over time in the day tank will be measured using the local level gauge and converted to flowrate. This is being done as a result of our review of the flowrate calculations to ensure they meet the accuracy requirements of ASME XI as required by Anomaly No. 3 in the SER of NRC approved Proposed Rev. 2A of the Unit 2 IST Program.

3) Added NRC approved Valve Relief Request No. 29 (page 186) for the Reactor Vessel Head Vent Valves [2RCS*SOV200A and B], [2RCS*SOV201A and B] and [2RCS*HCV250A and B] following NRC approval of Proposed Revision 2A for the Unit 2 IST Program, and deleted the old Cold Shutdown Justification No. 3. The relief request permits full stroke exercising and timing these valves open during refueling outages instead of at cold shutdown. The Valve Testing Outline Sheet on page 49 was also revised to reflect this change.

4) Changed the valve category of the Reactor Coolant Pump Thermal Barrier Cooler Discharge Valves [2CCP*ACV107A, B, and C] (pages 83 and 84) from "B" to "A" and the Supply Check Valves [2CCP*289, 290, and 291] (page 86 and 167) from "C" to "A/C". All six valves will be leak tested per 2BVT 1.60.6 during refueling outages. This was done in response to the recommendations made by design basis document open item DBD-15-2-C-017E.

5) Revised the forward direction exercise of Service Water Pump Discharge Check Valves [2SWS*57, 58, and 59] (page 100) to be a partial stroke exercise quarterly and a full stroke exercise during cold shutdowns and refueling outages per new Cold Shutdown Justification No. 3 (page 122). This is in compliance with the ASME XI Code, Section IWV-3522. Cold Shutdown Justification No. 43 (page 145) was also revised to reflect only reverse direction testing of the same check valves.

6) Also added Service Water Pump Header Check Valves [2SWS*106 and 107] (page 101) to Cold Shutdown Justification No. 3 and removed the old Relief Request No. 29 (partial stroke quarterly and full stroke at refueling) associated with these check valves from the BVPS-2 IST Program pending testing at cold shutdown. If the accident flowrate required to full stroke exercise [2SWS*57, 58 59] (above) and [2SWS*106 and 107] in the open direction cannot be achieved during cold shutdown testing during 3R, then the original relief request will be revised in a proposed revision to the BVPS-2 IST Program to full stroke exercise all five check valves at refueling. The revised relief request would require NRC approval prior to implementation and Cold Shutdown Justification No. 3 would be deleted.

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.9)

7) Added Personnel Airlock Valves [2PHS*100, 101, 110, 111, 112, and 113] (page 119) and referenced NRC approved Valve Relief Request No. 31 (pages 188 and 189) following NRC approval of Proposed Revision 2A for the Unit 2 IST Program. The relief request was needed since the piping and valve arrangement inside the Personnel Airlock is such that individual leakage rates for each valve cannot be measured. The relief request permits a leakage rate for the entire Personnel Airlock be assigned per 2BVT 1.47.8.

8) Added Emergency Airlock Valves [2PHS*201 and 202] (page 119) and referenced NRC approved Valve Relief Request No. 32 (pages 190 and 191) following NRC approval of Proposed Revision 2A for the Unit 2 IST Program. The relief request was needed since the piping and valve arrangement inside the Emergency Airlock is such that individual leakage rates for each valve cannot be measured. The relief request permits a leakage rate for the entire Emergency Airlock be assigned per 2BVT 1.47.10.

ENCLOSURE 2