

Docket No. 50-346

License No. NPF-3

Serial No. 1068

August 15, 1984



RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stolz:

Toledo Edison is submitting a Specific Relief Request for the Davis-Besse Nuclear Power Station Unit No. 1, for an exemption from testing valves DH-11 and DH 12, per the requirements of 10CFR50, Appendix J, Section III.A.1.d and III.C. The attached Specific Relief Request gives the basis for the request.

Transmitted with this letter are five (5) copies of the revised pages to the Inservice Inspection Valve Program for the Davis-Besse Nuclear Power Station, which was submitted on May 15, 1980 (Serial No. 616).

Any additions to the program that become necessary during the remainder of the 120 month interval, which do not meet the code testing requirements will be implemented as needed. A fully documented notification to the Nuclear Regulatory Commission (NRC) will be placed on the docket subsequent to implementation of the changes.

Very truly yours,

RPC:JDE:SGW:sc/nlf
cc: DB-1 NRC Resident Inspector
Pete Whold, NRC Region III

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Relief Request Number 30

- Components: P&ID M-033 DH-11, DH-12
- Function: Decay Heat Removal pump suction isolation, containment isolation, and class boundary valves.
- Class 1
- Testing Requirements: Per 10 CFR 50 Appendix J Sections III.A.1.d and III.C, pneumatic pressure testing every refueling outage.
- Basis for Relief Request: 10 CFR 50 requires the performance of a Type 'C' test on the containment isolation valves of the decay heat removal system. The decay heat removal system cannot be tested pneumatically due to the fact it is required to maintain the plant in safe condition during all modes of plant operation and, therefore, can not be drained and vented to containment atmosphere.
- Alternate Testing: Surveillance Test Procedure ST 5066.01, "Decay Heat Removal System ASME Section XI Inservice Hydro Test", requires valves DH-11 and DH-12 to be water pressure leak tested at 296 PSIG during every refueling outage and hydrostatically tested at 2371 PSIG once every 10 years. This test is conducted to meet ASME Section XI IWB requirements (2371 PSIG = 2155 PSIG x 1.10 at < 100°F). Normal operation during plant startup requires opening the valves at 200°F (approximately 200 PSIG) and closing the valves at 280°F (approximately 300 PSIG).

DAVIS-BESSE NUCLEAR POWER STATION UNIT NO. 1
VALVE TEST PROGRAM

System DECAY HEAT AND EMERGENCY CORE COOLING

Drawing No. 033

Rev. 34

Valve Number	Class	Drawing Coordinates	Valve Cat.				Passive	Size (Inches)	Valve Type	Actuator Type	Normal Position	Test Requirement	Code Exception	Alternate Testing	Test Frequency	Max. Stroke Time (Sec.)	Remarks
			A	B	C	D											
DH23	1	H-3	X				X 8	GA	MA	LC	L			R		LEAK TEST PER APPENDIX J	
DH21	1	H-2		X			X 8	GA	MA	LC	L			R		VALVE INTEGRITY TESTED WITH DH23 LEAK TEST BY DRAINING AND PRESSURIZATION BETWEEN THE VALVES	
DH20	1	H-2		X			X 0.75	GL	MA	LO	L			R			
DH24	1	H-2		X			X 0.75	GA	MA	LO	L			R			
DH11	1	H-3		X			X 12	GA	MO	CL	P	30		R			
DH12	1	H-2		X			X 12	GA	MO	CL	P	30		R			
DH4849	2	H-4			X		4	RL	SA	--	R			R			
DH9A	2	K-5		X			14	GA	MO	CL	S T	16	S T	R R	120		
DH9B	2	J-5		X			14	GA	MO	CL	S T	16	S T	R R	120		
DH82	2	K-11			X		14	CK	SA	--	S			Q		FORWARD FLOW TEST WITH DECAY HEAT PUMP TEST	
DH2733	2	J-6		X			X 18	GA	MO	OP	P			R			
DH81	2	J-10			X		14	CK	SA	--	S			Q		FORWARD FLOW TEST WITH DECAY HEAT PUMP TEST	
DH1517	2	H-5		X			X 12	GA	MO	CL	P			R			

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