

# Duquesne Light Company

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December 26, 1995

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 2  
Docket No. 50-412, License No. NPF-73  
Updated Inservice Testing Program, Issue 1, Revision 15**

The purpose of this submittal is to provide the Nuclear Regulatory Commission (NRC) with an informational copy of revisions to the Beaver Valley Power Station Unit 2 (BVPS-2) Inservice Testing (IST) Program.

Enclosure 1 provides a summary of the IST program changes which have been incorporated into Revision 15.

Enclosure 2 is issue 1, Revision 15 of the BVPS-2 IST Program. It has been determined that the Revision 15 IST program changes do not require NRC approval prior to implementation. This determination was made because all of the changes are either:

- editorial in nature, or
- in compliance with the 1983 Edition through Summer 1983 Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, or
- in compliance with the positions delineated in Attachment 1 or Supplement 1 of Generic Letter No. 89-04, "Guidance on Developing Acceptable Inservice Testing Programs."

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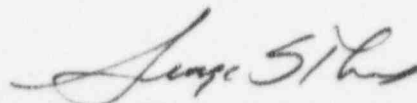
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If you have any questions regarding this submittal, please contact Mr. Roy K. Brosi  
at (412) 393-5210.

Sincerely,



George S. Thomas

c: Mr. L. W. Rossbach, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. D. S. Brinkman, Sr. Project Manager

**ENCLOSURE 1**

SUMMARY OF CHANGES

BEAVER VALLEY UNIT 2 IST PROGRAM

Issue 1, Revision 15

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.15)

- 1) Added reference to Supplement 1 of Generic Letter No. 89-04 (NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants") to the Pump and Valve Testing Requirements Sections (pages 2 and 78).
- 2) Revised the contents of the four (4) Corrective Actions listed on page 3 to be consistent with changes made to the BVPS-1 IST Program as a result of the Self-Assessment performed on the IST Programs.
- 3) Added the words, "(accuracy and range)" to aid in defining instruments at least as accurate on page 3 under the pump curve discussion (Item 2).
- 4) Added the word "centrifugal" to the paragraph describing MOP Curves (page 5) because MOP Curves are not included for positive displacement pumps. Deleted the pages in the MOP Curves Sections for the 24A and 24B Chemical Injection Pumps [2QSS\*P24A and B] which are positive displacement pumps.
- 5) Deleted reference to Containment Cooling Water Supply Header Flow Indicators [2CCP-FI117A2 and B2] from the Comments section of the Pump Testing Outline Sheets for [2CCP\*P21A, B and C] (pages 24, 25 and 26), since they are not calibrated per IST Program requirements and are not used in 2OST's-15.1, 2 and 3. The Component Cooling Water Pumps use [2CCP-FI117A1 and B1] for flow measurement in the OST's.
- 6) Added the "reference calculation" to the following pump MOP Curve pages in the BVPS-2 IST Program. The curves themselves were not changed.

<u>Pump</u>	<u>Pages</u>	<u>Reference Calculation</u>
[2CHS*P21A, B, C]	38-40	Westinghouse Calc. PS-C-104
[2SIS*P21A and B]	45,46	Westinghouse Calc. PS-C-104
- 7) Revised the shape of MOP Curve for the "A" Component Cooling Water Pump [2CCP\*P21A] (page 53) following its recent impeller replacement. The MOP Point was not changed.
- 8) Revised the MOP Curves for the Service Water Pumps [2SWS\*P21A, B and C] (pages 59, 60 and 61) due to an MOP Point change from 184 ft at 12740 gpm to 199 ft at 12720 gpm per Calculation No. 10080-N-726-0. The MOP Point was raised (conservatively) to account for throttling of normal flow to the Safeguards Area Air Conditioning Units [2HVR\*ACU207A and B] while maintaining the UFSAR minimum DBA flow rate.
- 9) Corrected reference to ASME/ANSI OMa-1988, Part 6 (OM-6) in accordance with NUREG-1482 in the Basis for Relief in Pump Relief Request No. 9 (page 75).
- 10) Added reference to "NUREG-1482, Paragraph 4.2.5" to the second paragraph in Section A (page 78) dealing with remote position verification (RPV) requirements.

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.15) (continued)

- 11) Stated on page 80 in the paragraph describing leak rate testing that Category A valves "shall be" leak rate tested at least once every two years. Also deleted "not to exceed every 2 years" later in the same paragraph describing Type C testing per 10CFR50 Appendix J. The revision of 10CFR50 Appendix J may not require testing every 2 years. These changes were made to be consistent with changes already made to the BVPS-1 IST Program.
- 12) Added reference to "NUREG-1482, Paragraph 3.1.1.1" to Section B (page 84) dealing with cold shutdown testing requirements.
- 13) Added reference to 20M-51.4.D as a remote position verification (RPV) test to the Comments section for valves [2IMS\*SOV950, 951, 952 and 953] (page 109) in addition to 20M-12.4.A already referenced.
- 14) Revised the testing of Component Cooling Water Pump Discharge Check Valves [2CCP\*4, 5 and 6] to a partial stroke open and a full stroke closed quarterly per 20ST-15.1, 2 and 3, and a full stroke open at cold shutdown per 20ST-15.1, 2 and 3 (page 119). Added Cold Shutdown Justification No. 58 (page 191) providing the basis for the change.
- 15) Revised stroke testing of [2FWE\*P22] Steam Supply Check Valves [2MSS\*18, 19, 20, 196, 199 and 352] (pages 125 and 127) in 20ST-24.4 to a partial forward stroke test quarterly and a full forward stroke test at cold shutdown per Cold Shutdown Justification No. 12 (page 162). It had been previously determined that the amount of steam flow through these check valves during recirculation flow testing of the Turbine Driven Auxiliary Feedwater Pump [2FWE\*P22] was more than adequate to full stroke them to their backstop. Recent NRC guidance in NUREG-1482 states that a full stroke of a check valve may be verified by passing the maximum accident flowrate through the valve. Since full flow testing of [2FWE\*P22] can only be done during cold shutdown, full stroke testing of these check valves with maximum steam flow to the Terry Turbine (which corresponds to maximum pump flow) will also be done during cold shutdowns as explained in CSJ No. 12.
- 16) Revised the remote position verification (RPV) test in the Comments section for [2MSS\*SOV120] (page 127) from 20ST-47.3B to 20ST-47.3A.
- 17) Deleted reference to measurement of upstream pipe temperatures on a monthly basis per 20ST-24.1 as an additional closure verification for AFW Pump Downstream Check Valves [2FWE\*42A, 42B, 43A, 43B, 44A, 44B, 99, 100 and 101] (pages 131-132). Measurement of upstream pipe temperatures was an additional test referenced in the BVPS-2 IST Program for information only, above and beyond that required by the IST Program, but which is no longer being performed in 20ST-24.1. Cold Shutdown Justification No. 40 (page 179) and Relief Request No. 19 (page 208) were also revised accordingly.

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.15) (continued)

- 18) Deleted reference to 2OST-47.3B in the Comments section for valves [2EGO\*106, 107, 108, 109, 114, 115, 116 and 117] (page 148) because closure stroke testing is now only done in 2OST's-36.3 and 4 at refueling (R).
- 19) Added reference to 2OST-44C.1 in the Comments section for valves [2HVR\*MOD23A, 23B, 25A and 25B] (page 150) as an additional stroke and time closure test and remote position verification (RPV) done at refueling (R). Also added reference to this OST in Cold Shutdown Justification No. 51 (page 185).
- 20) Corrected reference to ASME/ANSI OMa-1988, Part 10 (OM-10) in accordance with NUREG-1482 in the Basis for Relief in Relief Request No. 33 (page 229).