Docket No. 50-346

License No. NPF-3

Serial No. 1078

September 5, 1984

TOLEDO EDISON

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:

On May 24, 1984, Toledo Edison received a Safety Evaluation Report (SER) (Log No. 1521), dated May 18, 1984, on our revised Inservice Inspection and Testing Program., which was revised in accordance with the ASME Boiler and Pressure Vessel Code, Section XI of the 1977 Edition through the Summer 1978 addenda.

Following our review of the SER, a conference call was held between representatives of Toledo Edison, Mr. Al DeAgazio, Nuclear Reactor Regulation Project Manager, and Mr. P. Whold, Region III, to clarify an exemption from testing certain nuclear safety related pumps per the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWP-3000.

Specifically, the evaluation of our relief request on pump testing in the SER stated that the pump will be run monthly "to measure flow rate to ensure no pump head degradation". Since the data taken to ensure no pump head degradation will be taken once per quarter in accordance with the ASME Section XI requirements, it was clarified that Toledo Edison would perform the monthly pump jog test by ensuring pump starts through positive indication of flow rate or any other parameter which could verify the pump start.

Please find attached five (5) copies of the revised page to Toledo Edison's Relief Request Number 1, which was submitted on May 15, 1980 (Serial No. 616).

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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 will be placed on the docket subsequent to implementation of the changes.

Very truly yours,

RPC:JDE:SGW:nlf
cc: DB-1 NRC Resident Inspector
P. Whold, NRC Region III

Monthly pump testing requires a total of at least 270 hours per year of pump operation; at least 714 man-hours per year for data acquisition, analysis, and record keeping. This amounts to a total of 774 man-hours per year. At a conservative total cost of $20.00 per man-hour, this amounts to $15,480.00 per year. Based upon the average exposure rates in the areas of the Auxiliary Feedwater, High Pressure Injection, Low Pressure Injection, and Containment Spray Pumps, the total man rems exposure per year for pump testing is approximately 2.0 man rems. At the present conservatively estimated cost of $10,000.00 per man rem to plant personnel, this exposure costs an additional $20,000.00 per year. Total cost to our customers is approximately $35,480.00 per year for no significant increase in safety.

- Alternate Testing: Pumps will be tested in compliance with ASME Section XI once per quarter and will be jogged monthly. The monthly jog test will be to ensure the pump starts with some positive indication, i.e., flow rate, differential pressure, discharge pressure or any other parameter which could verify pump start. This is in agreement with present changes being implemented in Subsection IWP of the Code.

The revision to change pump testing to a three month interval in IWP-3400 has been approved and will be included in future Addenda. See Minutes of the November 28, 1979, meeting of the Operating and Maintenance Working Group - Testing of Pumps and Valves in San Jose, California, dated January 9, 1980.

b. Relief Request Number 2

- Components: Auxiliary Feedwater Pumps P14-1, P14-2
  High Pressure Injection Pumps P58-1, P58-2
  Low Pressure Injection Pumps P42-1, P42-2
  Containment Spray Pumps P56-1, P56-2
  Component Cooling Pumps P43-1, P43-2, P43-3
  Service Water Pumps P3-1, P3-2, P3-3

- Function: Emergency core cooling
  Safety related equipment cooling

- Class: 2 and 3

- Test Requirements: Measure pump bearing temperature yearly