



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE INSERVICE TESTING PROGRAM RELIEF REQUESTS

WISCONSIN ELECTRIC POWER COMPANY

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NO. 50-266 AND 50-301

1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a(g), requires that inservice testing (IST) of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to Subsections (a)(3)(i), (a)(3)(ii), or (g)(6)(i) of 10 CFR 50.55a. In requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance with certain requirements of the applicable Code edition and addenda is impractical for its facility.

These regulations authorize the Commission to grant relief from ASME Code requirements upon making the necessary findings. The NRC staff's findings with respect to granting or not granting the relief requested as part of the licensee's IST Program are contained in this safety evaluation (SE).

By letter dated December 21, 1990, Wisconsin Electric Power Company (WE) submitted Revision 0 of the Point Beach Nuclear Plant (PBNP) Units 1 and 2 Inservice Testing (IST) Program. Revision 0 was developed for the third 10-year interval to the 1986 Edition of ASME Code, Section XI. The revision incorporated NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." WE indicated that both units are on the same interval schedule for inservice testing and that the programs have been established to the same Code edition, with the third interval beginning December 31, 1990. This is discussed in Section 3.0 below.

Revision 1 of the PBNP IST program was submitted June 10, 1991. This revision corrected a number of technical and typographical errors. Evaluations of the relief requests are included in the attached Technical Evaluation Report (TER).

2.0 PBNP ACTIONS IN RESPONSE TO GENERIC LETTER 89-04

Wisconsin Electric Power Company (WE) initially responded to GL 89-04 in an October 3, 1989, letter providing a discussion on each position included in GL 89-04, Attachment 1, with a schedule for implementing the guidelines. In letters dated March 2, 1990, and June 28, 1990, updates to the status of

implementation of GL 89-04 were provided. In a January 16, 1991, letter, WE indicated that program changes addressing GL 89-04 guidance were complete but that implementing procedures were still under development for several systems.

In WE's letter of April 22, 1991, a status of the test procedures for the 16 pumps and 329 valves added to the IST program or tested differently than under the previous program was provided as follows:

- 31 procedure changes complete and available for use as of April 5, 1991
- 21 changes with technical input complete and in the processing, review, or approval stage for issuance by June 1, 1991
- Procedures for four systems not developed due to difficulties encountered or modifications required as follows:
 1. CVCS - Charging - no schedule provided
 2. CVCS - Boric Acid Transfer - pump insulation modification evaluated by June 1, 1992
 3. ESF HVAC - evaluate methods to fail-safe test refrigerant valves complete by March 1, 1992
 4. Component Cooling Water - evaluate modifying system to handle chromate-treated water for reuse rather than using temporary transport methods by June 1, 1992

The licensee must complete the necessary modifications identified in the four systems during the first scheduled refueling outages for each unit following the completion of the evaluations (March 1, 1992, and June 1, 1992). The licensee should complete the CVCS-Charging system evaluations no later than June 1, 1992, to be consistent with the completion of the later items discussed in the April 22, 1991, submittal.

3.0 APPLICATION OF SAME CODE EDITION AND CONSISTENT SCHEDULE FOR BOTH UNITS

The licensee has indicated that both Unit 1 and Unit 2 IST Programs have been developed to the 1986 Edition of ASME, Section XI. Further, the program indicated that the third 10-year interval for both units began December 31, 1990. The date of commercial operation for Unit 1 was December 21, 1970, and for Unit 2 October 1, 1972. At the time of commercial operation of Point Beach, Unit 1 and Unit 2, the regulations did not include requirements for inservice testing. Title 10 section 50.55a(g) was revised effective March 13, 1976, published in the Federal Register (41 FR 6256) February 12, 1976, requiring inservice testing with program updates at each 20-month period. The

extension to 120-month intervals for inservice testing was included in regulations effective November 1, 1979 (44 FR 57912) published in the Federal Register October 9, 1979.

WE submitted Technical Specification change requests (TSCR) dated February 17, 1977 (Unit 1, Number 42), and November 27, 1978 (Unit 2, Number 58), to reflect the revised inservice testing requirements. These TSCRs were reviewed along with the IST program relief requests submitted for the 10-year interval program revisions. The TSCRs were denied by NRC letter dated April 7, 1989, based on the issuance of GL 89-04.

Relief Requests Pump RR-1 and Valve RR-1 were included in the second 10-year interval IST programs to establish the same Code edition and schedule for both units in submittals dated February 10, 1981, and January 16, 1984. These relief requests did not conflict with GL 89-04 guidance and were, therefore, approved by GL 89-04 until the third 10-year interval following the licensee's response to GL 89-04, dated October 3, 1989.

In WE's submittal of the third 10-year interval dated December 21, 1990, the issue was discussed in the cover letter explaining that the licensee believed no relief request was required based on 10 CFR 50.55a(g) and Section XI. Because the licensee had established both units on the same schedule for a previous interval, and because IST program requirements effectively began for both units when the regulations were issued March 13, 1976, relief in each subsequent interval is not required. However, the IST program should continue to indicate that both units are on the same schedule for subsequent 120-month intervals in accordance with 10 CFR 50.55a(g)(4)(ii) and (4)(iv). NRC approval will be required for any change to this established schedule. The current 120-month interval schedule appears to be based on the commercial operation date of Unit 1, but the interval start date should be December 21, 1990, rather than December 31, 1990, as stated in the IST program document, Section 1.0. Additionally, any future revision other than 10-year interval revisions to the IST program which meet the requirements of subsequent editions and addenda should be applied to both units and NPC approval is required per 10 CFR 50.55a(g)(4)(iv).

4.0 VALVE RELIEF REQUEST VRR-4, TER SECTION 3.14.3

Relief Request VRR-4 is applicable to four safety injection (SI) check valves per unit. These valves are the injection valves from the SI accumulators and the SI pumps as depicted in Figure VRR-4-1 of the IST program. They also function as reactor coolant pressure isolation Event V valves. The relief request basis and proposed alternative testing are described in the TER. The TER recommends relief for extending the inspection interval for valves 1SI-867A, 2SI-867A, 1SI-867B, 2SI-867B, 1SI-842A, and 2SI-842A be denied based on insufficient justification that compliance with the recommended schedule in GL 89-04, Position 2, poses an extreme hardship. This SE endorses the TER evaluation for these six valves; however, additional justification of valvegroupping is considered necessary in that it is not clear that the SI-867 set of valves

experiences the same service conditions as the SI-842 set of valves. GL 89-04, Position 2, states that the valves in a group be identical in design and have the same service conditions, including valve orientation. It appears that the SI-867 set of valves would be subjected to reactor coolant system pressure during power operations, but that the SI-842 set of valves would not be subjected to this higher pressure unless the associated SI-867 valve leaks.

For valves 1SI-842B and 2SI-842B, the TER recommends that relief be granted provided the licensee has disassembled and inspected the valves and documented the results in detail. WE's response to GL 89-04 (October 3, 1969) committed to disassemble and inspect 1SI-842B and 2SI-842B "during the upcoming refueling outages." However, it is not clear in VRR-4 that the inspection of 1SI-842B has been performed. If not, the licensee is to perform the disassembly and inspection of 1SI-842B at the next refueling outage subsequent to receipt of this SE as a provision of the granting of relief. If this provision cannot be met, the licensee is to provide additional basis for continued operation of the valve for NRC review and approval prior to startup from the refueling outage.

Additionally, the relief is provisional on the licensee establishing a schedule for the disassembly and inspection of valves 1SI-842B and 2SI-842B of at least once every 120-month interval when the core is off-loaded for reactor vessel inservice inspection and any other refueling outage which includes core off-load and reactor coolant system drain-down. Even if the once-every-120-month interval inspection extends the refueling outage, the NRC believes the inspection is warranted at this extended frequency. The licensee has not justified otherwise in VRR-4.

Alternatively, several licensees have developed test methods for verifying full-stroke of these valves with partial flow while employing nonintrusive methods for monitoring disc movement. This option should be evaluated for these valves, and if the licensee implements the nonintrusive test methods, Relief Request VRR-4 should be deleted or revised as necessary.

5.0 EVALUATION

The licensee's IST program requests for relief from the requirements of Section XI have been reviewed by the staff with the assistance of its contractor, Brookhaven National Laboratory (BNL). The TER provided as Attachment 1 is BNL's evaluation of the relief requests. The staff has reviewed the TER and adopts the evaluations and conclusions contained in the TER. A summary of the status of the pump and valve relief request determinations is presented in Table 1. The granting of relief is based upon the fulfillment of any commitments made by the licensee in its basis for each relief request and the alternative proposed. The implementation of the IST program is subject to inspection by NRC.

The licensee should refer to the TER, Section 5.0, for a discussion of anomalies and action items identified during the review. The licensee should resolve all the items in Section 5.0 in accordance with the guidance therein. As necessary, program or procedural changes covered in Section 5.0 should be completed within

1 year of the date of this SE, by the schedule requested in the specific item, or by the date committed to by the licensee in response to GL 89-04, whichever date is earlier. For relief requests that have been denied, the licensee's testing should comply with the Code requirements or GL 89-04 guidelines within the first quarter after receiving this SE. The licensee is to address VRR-4 as discussed in SE Section 4.0 and TER Sections 3.14.3 and 5.34 prior to the next refueling outage for each unit.

6.0 CONCLUSION

The staff concludes that the relief requests as reviewed, evaluated, and modified by this SE will provide reasonable assurance of the operational readiness of the pumps and valves to perform their safety-related functions. The staff has determined that granting relief, pursuant to 10 CFR 50.55a (a)(3)(i), (a)(3)(ii), and (g)(6)(i), is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. In making this determination, the staff has considered the alternative testing being implemented, compliance resulting in a hardship without a compensating increase in safety, and the impracticality of performing the required testing and the burden if the requirements were imposed. The last column of Table I identifies the regulation or Generic Letter 89-04 guidance under which the requested relief is approved.

During the review of the licensee's inservice testing program, the staff has identified certain misinterpretations or omissions of 10 CFR 50.55a and Code requirements. The items are summarized in this SE and the TER, Section 5.0. The IST program relief requests for PBNP, Units 1 and 2, provided by the June 10, 1991, submittal, are acceptable for implementation provided the changes and actions described in the SE and Section 5.0 of the TER are completed within 1 year of receipt of this SE, as requested in the specific anomaly or action item, or as committed to in the licensee's responses to GL 89-04, whichever is earlier, or as otherwise directed in this SE.

Attachment: BNL Technical Evaluation Report

Principal Contributor: Patricia L. Campbell

Date: April 17, 1992

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests

Relief Request No. (IST Program Section)	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
PRR-1	2.1.1	IWP-4120, instrument range	All pumps.	Reading accuracy of temperature instruments will be $\pm 5\%$, speed instruments will be $\pm 2\%$.	Relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-2	2.1.2	IWP-3100, measure inlet pressure	All pumps.	None.	Relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-3	2.2.1	IWP-3100, quarterly flow measurement	P-015A & B, SI pumps.	Measure flowrate during refueling outage, measure other parameters quarterly. Alternate post-maintenance test schedule.	Relief granted in accordance with Generic Letter 89-04 and 10CFR50.55a(g)(6)(i). Relief granted in accordance with 10CFR50.55a(g)(6)(i) with provisions.
PRR-4	2.2.3	IWP-3100, quarterly flow measurement	P-016A & B, RHR pumps.	Measure flowrate during refueling outage, measure other parameters quarterly. Alternate post-maintenance test schedule.	Relief granted in accordance with Generic Letter 89-04 and 10CFR50.55a(g)(6)(i) with provisions.
PRR-5	2.3.1	IWP-3100, quarterly flow measurement, post-maintenance testing	P-029, 038A & B, Auxiliary Feedwater pumps.	Measure flowrate during cold shutdowns, measure other parameters quarterly. Alternate post-maintenance test schedule.	Relief granted in accordance with Generic Letter 89-04 and 10CFR50.55a(g)(6)(i) for the motor-driven pumps. Relief denied for the turbine-driven pumps.
PRR-6	2.4.1	IWP-3100, quarterly flow measurement	P-014A & B, Containment Spray pumps.	None.	Interim relief granted in accordance with 10CFR50.55a(a)(3)(i) for one year or until the next refueling outage, whichever is later.

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (IST Program Section)	3ER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
PRR-7	2.1.3	IWP-4510, measurement of vibration amplitude, location of pump vibration measurement.	All pumps.	Measure either vibration displacement or velocity. Measure vibration in a plane perpendicular to shaft in two mutually perpendicular directions.	Provisional relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-8	2.1.4	IWP-3300, 4310, bearing temperature measurement.	All pumps.	Monitor vibration.	Relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-9	2.1.5	IWP-4210, pump suction pressure gage lines.	All pumps.	Provide means to ensure or determine the presence or absence of liquid as required for the static correction used if could produce a difference of more than 0.25% in the calculated value of pump differential pressure.	Provisional relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-10	2.1.6	IWP-4110, instrument accuracy.	All pumps.	For instruments which have primary sensors associated with the instrument loop, the primary sensor accuracy is not considered. For local instruments and indicators and remote computerized indicators, use IWP-4110. For instrument loops which consist of transmitters and remote readouts for pressure and flowrate, use accuracy of $\pm 3\%$.	Interim relief granted for one year or until the next refueling outage, whichever is later, in accordance with 10CFR50.55a(a)(3)(i).

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (IST Program Section)	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
PRR-11	2.5.1	IWP-3100, quarterly flow measurement	P-004A & B, Boric Acid Transfer pumps.	Measure flowrate during refueling outages.	Interim relief granted for one year or until the next refueling outage, whichever is later in accordance with 10CFR50.55a(a)(3)(i).
PRR-12	2.5.2	IWP-3400(a) quarterly tests	P-004A & B, Boric Acid Transfer pumps.	Measure flowrate during refueling outages, measure vibration as practical.	Relief denied.
PRR-13	2.6.1	IWP-3300, pump inlet pressure measurement	P-032A through F, Service Water pumps.	Calculate inlet pressure.	Relief granted with provisions in accordance with 10CFR50.55a(g)(6)(i).
PRR-14	2.5.3	IWP-3300, pump suction and differential pressure measurement	P-002A through C, CVCS Charging pumps.	None.	Relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-15	2.7.1	IWP-3300, quarterly flow measurement	P-111A & B, cable spreading room chilled water pumps. P-112A & B, control room chilled water pumps.	Measure differential pressure.	Interim relief granted for one year or until the next refueling outage, whichever is later, in accordance with 10CFR50.55a(a)(3)(i).
PRR-16	2.1.7	IWP-3100, direct differential pressure measurement	All pumps.	Differential pressure will be calculated.	Relief not required.
PRR-17	2.2.2	IWP-3500, duration of tests	P-015A & B, SI pumps. P-010A & B, RHR pumps.	An overall run time of 5 minutes will be met.	Provisional relief granted in accordance with 10CFR50.55a(a)(3)(i).
PRR-18	2.3.2	IWP-3500, duration of tests	P-079, 038A & B, Auxiliary Feedwater pumps.	An overall run time of 5 minutes will be met.	Provisional relief granted in accordance with 10CFR50.55a(a)(3)(i).
VRR-1	3.11.1	IWP-3417(a), corrective action	Rapid acting valves (MS-02082)	Assign a 2 second maximum limiting stroke time.	Relief granted in accordance with Generic Letter 89-04.

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (IST Program Section)	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VRR-2	3.14.1	IWV-3521 and 3522, test frequency	SI-00845A through F SI and RHR pressure isolation check valves	Full-stroke exercise valves at refueling outages, verify closure in accordance with PIV Technical Specification.	Relief granted in accordance with 10 CFR 50.55a(g)(6)(i) for valves SI-00845 C and D. Relief granted with provisions in accordance with 10 CFR 50.55a(g)(6)(i) for valves SI-00845 A, B, E, and F.
VRR-3	3.14.2	IWV-3521 and 3522, test frequency	SI-00853 A through D SI and RHR pressure isolation check valves	Full-stroke exercise and verify closure each refueling outage and cold shutdown when "Event V" testing is required.	Relief granted in accordance with 10 CFR 50.55a(g)(6)(i).
VRR-4	3.14.3	IWV-3521 and 3522, test frequency and method	SI-00867A&B, 00842A&B SI and SI Accumulator check valves.	Partial-stroke exercise the valves and verify closure each refueling outage and cold shutdown when "Event V" testing is required. Additionally, partial-stroke exercise valve SI-00867B each cold shutdown which utilizes RHR pump. Verify closure of valves SI-00842A and B quarterly. Disassemble and inspect valves.	Relief granted with provisions in accordance with Generic Letter 89-04.
VRR-5	3.17.1	IWV-3412 and 3522, cold shutdown tests	Valves tested during cold shutdowns.	Perform cold shutdown tests in accordance with ASME/ANSI OM-10. Additionally, completion of all valve testing during cold shutdowns is not required if plant conditions preclude testing.	Relief granted in accordance with 10 CFR 50.55a(a)(3)(ii) for valves that can be tested during any cold shutdown. Relief denied for valves that cannot be tested during any cold shutdown.

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (IST Program Section)	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VRR-6	3.14.4	IWV-3521 and 3522, test frequency	SI-00854A&B RWST to RHR pump suction check valves.	Full-stroke exercise valves at refueling outages.	Open Item.
VRR-7	3.14.5	IW-3521 and 3522 test frequency	SI-00889A&B SI pump's discharge check valves.	Partial-stroke exercise valves quarterly, full-stroke exercise valves at refueling outages.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-8	3.5.1	IWV-3521 and 3522, test frequency	SI-00858A&B RWST to containment spray pumps' suction check valves.	Partial-stroke exercise valves quarterly and valve disassembly and inspection program.	Relief granted with provisions in accordance with Generic Letter 89-04.
VRR-9	3.5.2	IWV-3521 and 3522, test frequency and method.	SI-00862A&B Containment spray nozzles' supply check valves.	(1) verify valves' capability to open by valve disassembly and inspection program. (2) verify valves' closure capability during 10CFR50, App. J, leak rate tests.	(1) Relief granted with provisions in accordance with Generic Letter 89-04. (2) Relief denied.
VRR-10	3.4.1	IWV-3521 and 3522, test frequency	CC-00755A&B Component cooling water to RCP check valves.	Verify valves' closure capability during 10CFR50, App. J, leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-11	3.13.1	IWV-3521 and 3522, test frequency	RC-00528 CRT nitrogen supply check valves.	Verify valves' closure capability during 10CFR50, App. J leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-12	3.3.1	IWV-3521 and 3522, test frequency	CV-00304C&D Charging pump discharge to RCP seal check valves.	Verify valves' closure capability during 10CFR50, App. J leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-13	3.3.2	IWV-3521 and 3522, test frequency	CV-00370 Charging line containment isolation valves.	Verify valves' closure capability during 10CFR50, App. J leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (IST Program Section)	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VRR-14	3.9.1	IWV-3424, leak rate test method	IA-00644, 645, 1280, 1281 (Unit 1) IA-00876, 877, 1401, 1402 (Unit 2) Instrument air to purge valve boot seals	Perform pressure decay test	Relief granted in accordance with 10CFR50.55a(a)(3)(i).
VRR-15	3.15.1	IWV-3521 and 3522, test frequency and method	SW-00135A (Unit 1) SW-00112A (Unit 2) Service water to AFW pump check valves	Partial stroke exercise valves quarterly and disassembly and inspect valves each refueling outage.	Relief granted with provisions in accordance with Generic Letter 89-04.
VRR-16	3.8.1	IWV-3521 and 3522, test frequency	RM-03200AA Containment Atm. Monitoring System Containment isolation valves.	Verify valves' closure capability during 10CFR50, App. J leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-17	3.6.1	IWV-3413 and 3417, stroke time measurement	DA-03057A&B, 03058A&B EDG air starting motors' starting valves	Verify valve operational readiness during monthly EDG tests.	Relief granted with provisions in accordance with 10CFR50.55a(g)(6)(i).
VRR-18	3.13.2	IWV-3521 and 3522, test frequency	RC-00529 PRT makeup supply check valves.	Verify valves' closure capability during 10CFR50, App. J leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-19	3.3.3	IWV-3411 and 3412, test frequency	CV-00300 A&B Charging pump discharge to RCP manual throttle valves.	Verify valves' closure capability during 10CFR50, App. J leak tests.	Relief granted with provisions in accordance with 10CFR50.55a(g)(6)(i).
VRR-20	3.11.2	IWV-3413 and 3417, stroke time measurement	MS-02090 Auxiliary feedwater pumps cooling water solenoid valves.	Verify valve operation by measuring system parameters.	Interim relief granted with provisions in accordance with 10CFR50.55a(a)(3)(i).

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (ISI Program Section)	TER Sect	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VRR-21	3.10.1	IWV-3521 and 3522, test frequency and method	CS-00466 AA & BB, CS-00476 AA & BB Main FW check valves to SG	Verify closure capability by performing leak tests of two valves in series each refueling outage and perform valve disassembly and inspections.	Interim relief for one year or until the next refueling outages with provisions in accordance with 10CFR50.55a(a)(3)(i).
VRR-22	3.14.6	IWV-3427(b), leakage corrective action	SI-00845 A through F, 853 A through D, 867 A & B SI and RIIR pressure isolation valves	Evaluate PIV leakage in accordance with Technical Specification.	Relief granted in accordance with 10CFR50.55a(a)(3)(i).
VRR-23	3.16.1	IWV-3426 and 3427, test method.	Containment isolation valves	Assign maximum leak rates to combinations of CIV.	Relief granted with provisions in accordance with 10CFR50.55a-(g)(6)(i) for Aux. Steam, CVCS, Cont. Spray, Heating and Ventilation and Waste Disposal System Valves. Relief denied for component cooling water, instrument air and post accident containment venting and monitoring system valves.
VRR-24	3.3.4	IWV-3521 and 3522, test frequency	CV-00351 Boric acid transfer pump discharge to charging pump suction check valves.	Verify the valves' full stroke opening at refueling outages.	Open Item.
VRR-25	3.6.2	IWV-3522, full stroke test method and frequency IWV-3413, stroke time measurement	DA-00125, 126, 225, 226, 6316 A&B, 6317 A&B, 6318 A&B, 6319 A&B EDG Air Start Valves	Verify valve operability during monthly EDG tests.	Relief granted with provisions in accordance with 10CFR50.55a-(g)(6)(i).
VRR-26	3.3.5	IWV-3521 and 3522, test frequency	CV-00333 A&B Boric acid transfer pumps discharge check valves.	Partial-stroke exercise valves quarterly, full-stroke test at refueling outages.	Open Item.

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (IST Program Section)	TER Sect.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VRR-27	3.14.7	IWV-3521 and 3522, test frequency and method	SI-00891 A&B SI pumps' minimum flow line check valves.	Partial-stroke exercise valves quarterly, disassembly and inspect valves.	Relief granted with provisions in accordance with Generic Letter 89-04.
VRR-28	3.1.1	IWV-3413, stroke time measurement	AF-4002, 4007, 4014 Auxiliary feedwater pump minimum flow valves.	Verify the valve closes when the pump main line flow reaches a value which assures the pump will not be damaged. No stroke time will be measured.	Relief denied.
VRR-29	3.16.2	IWV-3427(b), leakage corrective action	Containment isolation valves 6" NPS and larger.	Evaluate CIV leakage rates in accordance with IWV-3426 and 3427(a).	Relief granted in accordance with Generic Letter 89-04.
VRR-30	3.4.2	IWV-3521 and 3522, test frequency	CL-00767 Component cooling to excess letdown heat exchangers check valves.	Verify valve closure capability during 10CFR50, App. J leak tests.	Relief granted in accordance with 10CFR50.55a(g)(6)(i).
VRR-31	3.2.1	IWV-3521, 3522, test method	HV-00898A, 900A, 914A, 916A Chilled water pump's discharge check valves.	Partial-stroke exercise quarterly and valve disassembly and inspection program.	Relief granted with provisions in accordance with Generic Letter 89-04.
VRR-32	3.9.2	IWV-3420, leak test method	IA-01206, 1209, 1605, 1606 (Unit 1) IA-01335, 1338, 1652, 1653 (Unit 2) PORV instrument air supply check valves.	Perform leak test of two valves in series.	Relief not required.
VRR-33	3.7.1	IWV-3412, full-stroke test method	FO-03940, 3941 EDG fuel oil transfer pumps' discharge valves.	Verify valve disk movement by monitoring system operating parameters.	Relief not required.

Point Beach Nuclear Plant - SE Table 1 - Summary of Relief Requests (Cont'd)

Relief Request No. (of Program Section)	TCR Ser.	Section XI Requirement	Equipment Identification	Proposed Alternate Method of Testing	NRC Action
VRP-34	3.12.1	FWV-3411, test frequency	H2-V-04,05,12,13,19,20, 22,23 Post accident containment vent containment isolation valves.	Exercise valves once per year.	Relief denied.