



U. S. Nuclear Regulatory Commission Attn: Document Control Room Washington, D.C. 20555

June 4, 1992 3F0692-07

Subject: Refue. 3 Scope

Reference: 1. FPC to NRC letter, 3FU392-01, dated March 24, 1992 2. NRC to FPC letter, 3N0592-09, dated May 11, 1992 3. NRC to FPC letter, 3N0690-15, dated June 21, 1990

Dear Sir:

FPC appreciates your prompt and positive response to "eference 1 and our continued efforts to appropriately manage outage activities. Your response (Reference 2) requested confirmation of a few key items to close out your approval. These are provided below.

Reactor Building Equipment Relocation

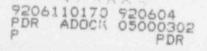
The Leidown Cooler Isolation:

These valves will isolate on a Reactor Building Isolation ESFAS signal early in any LOCA scenario. These are AC Motor Operated Valves which will not change position as a result of submergence. No changes to plant procedures or operator training are considered necessary. A modification to add additional fusing will be implemented to assure that position indication to other valves will not be lost as a result of the submergence of the position indication circuitry for these valves.

Other Equipment Relocation:

The junction box for DHV-3 was more carefully walked down as part of the modification development process. It has been determined to be above the maximum projected flood level and does not need to be relocated.

The balance of the equipment relocations that were deferred until 9M have been further evaluated in light of the current outage status. The complexity of the remaining work cannot be effectively carried out in the remaining window for such work in the current outage. It will be completed in 9M as indicated in Reference 1.



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All of the interim corrective actions approved in Reference 3 will remain in effect until 9M when the relocations will be completed. That is, the post-LOCA emergency operating procedure guidance will require ECCS swap-over prior to reaching the existing level of the affected equipment. The related modifications and license amendment requests (associated with Tri-Sodium Phosphale replacement for Chemical Addition to Building Spray and Maximum BWST level) will need to be deferred until 9M.

Environmental Qualification

All equipment on the EQ Master List that is not qualified prior to restart from 8R will be addressed in a manner consistent with Generic Letter 88-07. The installed motors on DHV-3 and -4 were determined to be qualified. The only components that are not like'y to be qualified are associated with the Makeup Pump Lube Oil Pumps. Thus, we anticipate completion of all EQ work by 9M as well.

The status of the other activities addressed in the letter are as follows:

- 1) HPI Flow Upgrade modification is complete and being functionally tested.
- 2) The SASS modification is complete and being functionally tested.
- 3) The RW expansion joint encapsulation has been deferred. The field configuration of the joints was not conducive to construction of the joints as planned. Minor changes should allow the project to resume at the next opportunity. Parts may be done on-line.
- 4) The retubing of the 'A' waterbox is complete. Testing, coating, reconstruction of system components and interferences and other related activities are in progress.
- 5) The MOV dP testing has been expanded to include more extensive testing of all EFW block valves. Enhancements (modifications or administrative changes) to some other valves were added to the outage scope. The priority of the balance of the valves in the program is being reviewed based on recent experience. The EFW block valves failed the dP tests and are being modified and re-tested prior to restart.
- 6) The installation of FWP-7 is proceeding well. The post-modification testing may conflict somewhat with the installation of the replacement EFV's noted above. Nevertheless, the pump will be completed prior to restart.
- 7) The PI replacements are proceeding as planned. We understand the associated license amendment will be issued in the next few weeks. This schedule will support our needs.
- The planned scope of equipment relocation above he flood plain is proceeding as planned.

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- 9) The EQ modifications are proceeding as planned.
- 16) The SBO modifications are complete. Final testing, turnover and procedures are in progress. Some additional work scope (testing) is required to resolve a concern associated with DC voltage level supplied to the EFW control valves during an SBO event.
- The revised HELB program was supplied for NRC information under separate cover.
- 12) The RV Fluence monitoring is complete.
- The preliminary work on the new 'B' ES Transformer is proceeding as planned.
- 14) The 'C' Reactor Coolant Pump rotating element has been replaced.
- 15) The waterslap of the OTSG's was completed.
- 16) The TS required ECT of the OTSG's has been completed. We have expanded the scope of the ECT to include as many as possible of the tubes in the 'B' OTSG that have never been inspected in-service.
- 17) The low pressure turbine rotor inspection did identify significant cracking in the turbine blade/shroud weld area. Significant modification, replacement, repair efforts are underway that are likely to extend the final breaker closure by a few days.

We will continue to keep the Resident Inspectors and our Project Manager informed of the outage progress on a regular basis. We appreciate the quick response and other support the NRC Staff has provided on a number of subjects associated with this outage.

Sincerely,

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P. M. Beard, Jr. Senior Vice President Nuclear Operations

PMB/KRW

xc: Regional Administrator, Region II Senior Resident Inspector NRR Project Manager