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September 25, 1984

(504) 386-2345
W3P84-2686

3-A1.01.04

3-A47.03

Mr. G.W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Knighton:

SUBJECT: WATERFORD STEAM ELECTRIC STATION - UNIT NO. 3
DOCKET NO. 50-382
PUMP AND VALVE INSERVICE TEST PLAN, REVISION 1, CHANGE 1

REFERENCE: Letter W3P82-2605 dated September 13, 1982

In accordance with 10CFR50.55a(g), "Inservice Inspection Requirements", Louisiana Power & Light hereby submits to the NRC three (3) originals and four (4) copies of the subject Test Plan which is prepared in accordance with the ASME Code Section XI, 1980 Edition with Addenda through Winter 1981. Relief from the testing requirements of Section XI is requested when full compliance with the requirements of the code is not practical. In such cases, specific information is provided which identifies the applicable code requirements, justification for the relief request, and the testing method to be used as an alternative. Revision 0 of the subject Test Plan was submitted per the referenced letter.

This revision to the subject Test Plan is being submitted at this time as a result of extensive in-house reviews of our previous submittal. The major changes to the document are summarized in the Attachment. These changes are an improvement and an enhancement to our Test Plan and reflect our best effort for testing the safety-related pumps and valves at Waterford 3.

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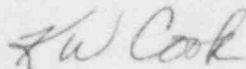
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Mr. G.W. Knighton
W3P84-2686
Page 2

It is hereby requested that the subject Test Plan be approved and the ASME Section XI code relief requested be granted pursuant to Section 50.55a(g)(6)(1) of 10 CFR 50.

Very truly yours,



K. W. Cook
Nuclear Support & Licensing Manager

KWC/BGM/cmb
Enclosure
Attachment

cc (w/o enclosure): E.L. Blake, W.M. Stevenson, J.T. Collins, D.M.
Crutchfield, J. Wilson, G.L. Constable, T.A.
Flippo

cc (w/enclosure): J.D. Page; NRC-MEB
H.C. Rockhold - EG&G

ATTACHMENT
MAJOR CHANGES CONTAINED IN REVISION 1 CHANGE 1
LP&L PUMP & VALVE INSERVICE TEST PLAN

1. Updated to Winter '81 Addenda of Section XI as required by 10CFR50.55a(g). There are no testing changes as a result of the update.
2. Added relief request 2.1.3 to use fixed-resistance flow paths for testing pumps that do not have a throttling valve in their minimum recirculation lines. The pumps affected are HPSI, LPSI, CS, EFW, and BAM.
3. Deleted clarification 2.2.1 for establishing an extra set of reference values for the LPSI pumps. Will use minimum recirculation flow path only.
4. Deleted a note in section 3.0 which pointed out that there were spaces left blank in the valve tables. All blank spaces have now been filled. Also, some of the valve stroke time limits have been changed.
5. Added nitrogen and instrument air valves, associated with the safety-related nitrogen accumulators, to the Test Plan. These valves will be tested at refueling outages.
6. Changed the relief requests on valves SI-604A&B and CS-128A&B. These valves will be disassembled and stroked manually once per inspection period (IWC-2412).
7. Added a relief request for RCS vent valves. They will be tested per Tech. Spec. 4.4.10 during cold shutdowns instead of quarterly.
8. Changed the relief request for the Safety Injection Tank discharge check valves. A partial stroke test is claimed now rather than a full-stroke test. The tanks, without nitrogen over-pressure, will be discharged into the RCS during each refueling outage.
9. Changed the relief request on EFW Pump discharge checks. The partial-stroke test at power was found to be a hardship with very little, if any, benefit.
10. Added a relief request for Blowdown Isolation Valves EFW-220A&B and FW-179A&B to be tested at cold shutdowns. Testing at power could cause diversion of Emergency Feedwater flow.

11. Added valves FW-166A&B and FW-173A&B. These valves now receive two channels of the Main Steam Isolation Signal. Also, deleted check valves FW-180A&B and FW-181A&B from the Test Plan.
12. Added a relief request for valves MS-402A&B, check valves supplying Main Steam to EFW Turbine-Driven Pump. The valves will receive a partial-stroke test quarterly and a full-stroke test at cold shutdowns.
13. Changed drawing numbers and coordinates on valves in some systems such as Component Cooling and Instrument Air. The flow diagrams have been redrawn.
14. Added a relief request for Component Cooling valves associated with the Containment Fan Coolers. The valves will be tested at cold shutdowns rather than quarterly at power. Testing quarterly could force a plant shutdown since all Containment Coolers are required to be operable per Tech. Specs.
15. Added a relief request for valves CAR-102A&B, Containment Atmospheric Release supply checks, to be tested at cold shutdowns. Testing of these valves at power could provide an unmonitored radioactive-material release path.
16. Added a relief request for valves CVR-102&202, Containment Vacuum Relief checks. These valves will be manually stroked at cold shutdowns without a mechanical exerciser.
17. Added valves CVR-401A&B to the Test Plan. These valves receive a Containment Isolation Actuation Signal and provide isolation for non-essential instrumentation.
18. Added four Primary Sampling valves. No relief is requested.
19. Added four Blowdown valves. No relief is requested.
20. Changed the relief request for valves BAM-129A&B, BAM Pumps A&B discharge checks. The partial-stroke testing at power cannot be performed due to a lack of heat tracing on some of the piping.
21. Deleted clarification 3.2.1. The RCS Vent valves were changed from Category A to Category B.
22. Replaced clarification 3.2.4 with relief request 3.1.24. The LPSI check valves cannot be full-stroke tested with the LPSI pumps operating in the Shutdown Cooling Warm-up loop. These valves receive only a partial-stroke test quarterly.

23. Replaced clarification 3.2.6 with relief request 3.1.44. See item 12 above.
24. Corrected typos and made minor editorial changes.