



U-601997
L30- 92(06-25)LP
8E.100c

June 25, 1992

Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station
Response to NRC Safety Evaluation
of Inservice Testing Program

Dear Sir:

By NRC letter dated September 30, 1991, Illinois Power (IP) received the results of the NRC's review of the Clinton Power Station (CPS) Inservice Testing (IST) Program for the initial 120-month inspection interval. The NRC's September 30, 1991 Safety Evaluation (SE) concluded that, with the exception of those relief requests which were denied, the CPS IST Program is acceptable for implementation provided the items ("anomalies") identified in the SE are addressed within eight months of receipt (i.e., June 25, 1992). Resolution of the items identified in the SE was the subject of a meeting between IP and NRC staff personnel at the NRC's White Flint offices on January 23 and 24, 1992. A meeting summary, including a list of attendees, was issued by NRC letter dated March 3, 1992. In addition, IP submitted a letter as a follow-up to that meeting which provided a summary of IP's proposed course of action to resolve the items identified in the SE (reference IP letter U-601949 dated April 3, 1992). In that letter it was noted that IP would be submitting a final response to the SE items by June 25, 1992. Accordingly, this letter is being submitted to provide IP's responses to the 21 items identified in the NRC's SE. IP's responses to these items are based on IP's April 3, 1989 letter and a subsequent conversation with the NRC staff on June 9, 1992.

IP's responses to the SE items, as well as related information and details, are provided in the attachments to this letter. Attachment 1 provides a brief summary of each SE item (anomaly) and IP's associated response. Attachment 2 provides revised appendices (Appendix III and Appendix V) to the CPS IST Program which reflect resolution of the items identified in the SE.

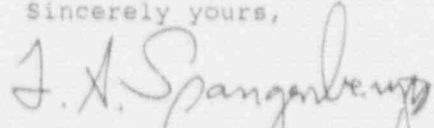
It should be noted that in IP's April 3, 1992 letter, IP requested continued relief (beyond June 25, 1992 as specified by the SE) from a number of ASME Code requirements. As a number of these requirements

9206300077 920625
PDR ADOCK 05000461
PDR

A047
110

involve testing which is performed on a quarterly basis or performed following corrective maintenance, IP is requesting that the NRC continue to give appropriate review priority to these requests.

Sincerely yours,



F. A. Spangenberg, III
Manager, Licensing and Safety

DAS/alh
TBE3:DASS

Attachments

cc: NRC Clinton Licensing Project Manager
NRC Resident Office
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

Background

By letter dated September 30, 1991, Illinois Power (IP) received the results of the NRC's review of the Clinton Power Station (CPS) Inservice Testing (IST) Program for the initial 120-month inspection interval. As identified in the NRC's September 30, 1991 Safety Evaluation (SE), the CPS IST Program is acceptable for implementation (except for those relief requests which were denied) provided the items ("anomalies") identified in the SE are addressed within eight months of receipt. IP's responses to these items or anomalies are provided below and are based on the results of meetings with the NRC staff on January 23 and 24, 1992 (as documented in IP's letter dated April 3, 1992) and a subsequent telephone conference on June 9, 1992.

Anomaly No. 1 (SE Section 2.1.2.1)

Anomaly No. 1 addresses Relief Request No. 3006 regarding general relief from the ASME Code-specified allowable ranges for pump flow rate and differential pressure for all pumps contained in the CPS IST Program. IP proposed to use allowable ranges which have less restrictive upper limits than the Code for these pump parameters. The SE stated that general relief from the allowable range limit requirements of the Code should not be granted. As a result, Relief Request No. 3006 was denied.

As a result of further discussion with the NRC staff in January 1992, Relief Request No. 3006 was revised to address only the four water-leg pumps 1E12-C003, 1E21-C002, 1E22-C003, and 1E51-C003. This revised relief request provides additional justification for alternate acceptance criteria for these four pumps based on historical pump performance. Revised Relief Request No. 3006 was submitted for NRC review in IP's April 3, 1992 letter and is reflected in Attachment 2. As this testing is performed on a quarterly basis, IP's April 3, 1992 letter also requested priority review of this revised relief request.

Anomaly No. 2 (SE Section 2.3.1.1)

Anomaly No. 2 addresses Relief Request No. 3002 regarding relief from the Code-specified allowable ranges for the diesel generator fuel oil transfer pump flow rate and a proposed alternate method for calculating the pump flow rate. IP proposed to use allowable pump flow rate ranges which are based on the design requirements of the associated diesel generator system. The SE concluded that the proposed allowable ranges are not acceptable because they can allow substantial pump degradation without requiring corrective action to be taken. Therefore, relief from the Code-specified allowable pump flow rate ranges was denied. With respect to the proposed method for calculating the pump flow rate, the SE concluded that the proposed method is acceptable if the accuracy and repeatability is adequate to monitor pump hydraulic condition and detect pump degradation. As a result, the proposed method for calculating the pump flow rate was granted with provisions.

As stated in IP's April 3, 1992 letter, the pump flow rate can be calculated with sufficient accuracy and repeatability to meet the Code requirements. In addition, Relief Request No. 3002 was revised to provide additional justification for the allowable pump flow rate ranges proposed

for these pumps. This additional justification is based on historical pump performance. Revised Relief Request No. 3002 was submitted for NRC review in IP's April 3, 1992 letter and is reflected in Attachment 2. As this testing is performed on a quarterly basis, IP's April 3, 1992 letter also requested priority review of this revised relief request.

Anomaly No. 3 (SE Section 3.1.2.1)

Anomaly No. 3 addresses Relief Request No. 1002 which proposed that testing of safety-related pumps or valves not be required to be performed when the redundant subsystem is out of service for maintenance or repairs. This relief request would require testing to be performed on the component within seven days after the out-of-service subsystem is returned to service. The SE concluded that IP did not adequately demonstrate the impracticality of complying with the Code-specified testing frequencies under these circumstances. Therefore, Relief Request No. 1002 was denied.

Relief Request No. 1002 was withdrawn by IP's April 3, 1992 letter. As a result, IP will comply with the Code-specified testing frequencies.

Anomaly No. 4 (SE Section 3.1.3.1)

Anomaly No. 4 addresses Relief Request No. 2011 regarding relief from the Code requirement to individually leak rate test certain containment isolation valves. IP proposed to leak test these valves in groups. The SE concluded that when individual leak rate testing is impractical because of the lack of necessary test taps and/or isolation valves, testing in groups is acceptable provided that group leakage limits are conservatively established such that excessive leakage through any individual valve in the group can be detected and the appropriate corrective action taken. As a result, Relief Request No. 2011 was granted with provisions with respect to individual leak rate testing of containment isolation valves.

IP's April 3, 1992 letter identified that IP would implement the provisions identified in the SE. However, an extension to the required implementation date was necessary (beyond June 25, 1992 as specified in the SE). As a result, IP requested that an extension of the required implementation date be granted until the next test of the applicable valve(s) is performed after August 26, 1992.

As a result of experience with leak rate testing gained during the most recent refueling outage (RF-3), IP now believes that testing containment isolation valves in groups can provide sufficient information to detect individual valve degradation. The basis for this determination was discussed with NRC staff personnel on June 9, 1992. As a result of IP's experience gained during the most recent refueling outage and the discussions with the NRC staff on June 9, 1992, IP is providing a new relief request (Relief Request No. 2034). This new relief request is contained in Attachment 2 and provides specific justification for IP's determination that group leakage limits can be specified such that individual valve degradation is detected.

IP no longer plans to revise plant procedures to implement the provisions identified in the SE. As a result, and based on the justification provided in new Relief Request No. 2034, IP requests that an extension of the date

for which the SE provisions are required to be implemented for Relief Request No. 2011 be granted until NRC review of new Relief Request No. 2034 is complete. IP now requests priority review of new Relief Request No. 2034.

Anomaly No. 5 (SE Section 3.1.4.1)

Anomaly No. 5 addresses Relief Request No. 2021 regarding relief from the Code requirement to perform post-maintenance testing of valves under certain circumstances. Specifically, IP proposed that post-maintenance testing of valves which cannot be tested during power operation be deferred if the maintenance performed consists only of valve stem packing adjustments within limits specified by the valve's manufacturer. The SE concluded that, due to the sensitive nature of this maintenance work and the possibility of introducing common mode failures, relief could only be granted from the Code requirements if certain guidelines for valve stem packing adjustments are followed. As a result, Relief Request No. 2021 was granted with provisions.

As a result of the complexity involved in implementing the guidelines provided in the SE, Relief Request No. 2021 was withdrawn by IP's April 3, 1992 letter. Therefore, IP will comply with the Code requirements for performing post-maintenance testing of valves following valve stem packing adjustments.

Anomaly No. 6 (SE Section 3.1.6.1)

Anomaly No. 6 addresses Relief Request No. 2027 regarding relief from the Code requirement to individually leak rate test drywell isolation valves. IP proposed to leak test these valves together by performing a drywell bypass leakage test (which is currently required by the CPS Technical Specifications). The SE concluded that the proposed alternate testing does not provide sufficient information to assure that these valves are individually capable of performing their Category A leak-tight closure function. However, the SE also concluded that adequate time should be allowed to develop procedures to individually leak rate test these valves. As a result, interim relief was granted until June 25, 1992.

As identified in IP's April 3, 1992 letter, IP has reevaluated these valves and determined that they are not Category A components. The IST Program has been revised to reflect that the drywell isolation valves are now either Category B or C components. Since these valves are no longer Category A components, individual valve leak rate testing is not required by the Code and this relief request is no longer necessary. As a result, IP is now withdrawing Relief Request No. 2027. The revised IST Program included in Attachment 2 reflects that drywell isolation valves are now considered to be either Category B or C components.

Anomaly No. 7 (SE Section 3.1.7.1)

Anomaly No. 7 addresses Relief Request No. 2011 regarding leak rate testing of excess flow check valves as required by the Code. IP proposed to verify that leakage past these valves is not excessive by performing an Integrated Leakage Rate Test (ILRT) once every 40 months. The SE concluded that the proposed testing is acceptable since these valves are not designed to be

leaktight. However, IP should also demonstrate that each excess flow check valve actuates to restrict flow when subjected to the set differential pressure. As a result, Relief Request No. 2011 was granted with provisions with respect to testing of excess flow check valves.

As stated in IP's April 3, 1992 letter, the IST Program and implementing procedures currently verify that each excess flow check valve actuates to restrict flow when subjected to the set differential pressure. As a result, no further actions are required for Relief Request No. 2011 with respect to testing of excess flow check valves.

Anomaly No. 8 (SE Section 3.1.8.1)

Anomaly No. 8 addresses Relief Request No. 2008 (Rev. 2) regarding relief from the exercising frequency requirements of the Code for water-leg keep-fill check valves 1E12-F085A, B, C; 1E21-F034; and 1E22-F006. IP proposed to satisfy this requirement for these valves by disassembling and inspecting them on a sampling basis during each refueling outage. The SE concluded that IP had not adequately demonstrated the impracticality of performing the required exercise testing of these valves. However, the SE also concluded that adequate time should be allowed to develop procedures to perform the required exercise testing. As a result, interim relief was granted until June 25, 1992 for these valves with an additional requirement to disassemble and inspect each of these valves (rather than a sample) during the interim relief period.

As discussed in IP's April 3, 1992 letter, Relief Request No. 2008 has been revised (Rev. 3) based on the results of the meeting with the NRC staff in January 1992. IP now proposes to satisfy the exercise testing requirement for these valves by testing the in-series check valves as a single unit on a quarterly basis. IP's April 3, 1992 letter requested extension of the interim relief period (for Relief Request No. 2008, Rev. 2) until NRC review of revised Relief Request No. 2008 (Rev. 3) is complete. IP's April 3, 1992 letter also provided justification for continuing the sample-based refueling outage testing (as described in Relief Request No. 2008, Rev. 2) for these water-leg keep-fill check valves rather than requiring disassembly and inspection of all these valves each refueling outage until NRC review of revised Relief Request 2008 (Rev. 3) is complete.

IP's April 3, 1992 letter noted that Relief Request No. 2008 (Rev. 2) also addressed exercise testing of reactor water cleanup system check valves 1G33-F051 and 1G33-F052A, B. IP also proposed to satisfy the exercise testing requirement for these valves by disassembling and inspecting them on a sampling basis during each refueling outage. This portion of Relief Request No. 2008 (Rev. 2) was granted with provisions. Based on discussions with the NRC staff in January 1992, IP also revised the alternate exercise testing for these valves to consist of testing the in-series check valves as a single unit on a quarterly basis. The alternate testing for these reactor water cleanup system check valves has been addressed separately in new Relief Request No. 2033 for clarity. As Relief Request No. 2033 is a new relief request, IP's April 3, 1992 letter requested that the proposed extension of the interim relief period for Relief Request No. 2008 (Rev. 2) also apply to the reactor water cleanup system check valves until NRC review of new Relief Request No. 2033 is complete. Further, IP's April 3, 1992 letter provided justification for

continuing the sample-based refueling outage testing (as described in Relief Request No. 2008, Rev. 2) for these reactor water cleanup system check valves (rather than requiring disassembly and inspection of each of these valves each refueling outage) until NRC review of new Relief Request No. 2033 is complete.

Revised Relief Request No. 2008 (Rev.3) and new Relief Request No. 2033 are reflected in the revised IST Program contained in Attachment 2.

Anomaly No. 9 (SE Section 3.2.1.1)

Anomaly No. 9 addresses Relief Request No. 2012 regarding relief from the exercising frequency and stroke time measurement requirements of the Code for the main steam automatic depressurization system (ADS) valves. IP proposed to exercise these valves during refueling outages but not to measure their stroke time. The SE concluded that relief should be granted from the exercising frequency requirements; however, the alternate testing method should provide information sufficient to monitor for ADS valve degradation. As a result, Relief Request No. 2012 was granted with provisions

As discussed in IP's April 3, 1992 letter, this relief request has been revised to be consistent with NRC Generic Letter 89-04 Position 6 regarding rapid-acting valves. Based on discussions with the NRC staff in January 1992, considering these valves to be rapid-acting and assigning a maximum stroke-time limit of two seconds satisfies the concerns identified in the SE. Revised Relief Request No. 2012 was provided in IP's April 3, 1992 letter and is reflected in Attachment 2. As the revised relief request is consistent with NRC Generic Letter 89-04, no further NRC review of this relief request is required. However, as further identified in IP's April 3, 1992 letter, additional time is required to complete the procedure changes necessary to implement the revised relief request. As a result, IP requested that the required implementation date for Relief Request No. 2012 be extended until performance of the next test of the applicable ADS valve(s) following August 26, 1992. The next scheduled performance of these tests will be during the fourth refueling outage which is currently scheduled to begin in October 1993.

Anomaly No. 10 (SE Section 3.2.2.1)

Anomaly No. 10 addresses Relief Request No. 2031 regarding relief from the safety/relief valve (SRV) test method requirements of the Code for the main steam SRVs. IP proposed to replace at least eight of the 16 main steam SRVs each refueling outage with SRVs that have been refurbished. Further, IP requested that testing of additional SRVs not be required, regardless of the results of testing the SRVs which are removed. The SE concluded that the proposed alternate testing is not conservative and does not appear to be warranted. As a result, Relief Request No. 2031 was denied.

Relief Request No. 2031 was withdrawn by IP's April 3, 1992 letter. As a result, IP will comply with the Code requirements for main steam SRV testing.

Anomaly No. 11 (SE Sections 3.4.1.1., 3.5.1.1, and 3.6.1.1)

Anomaly No. 11 addresses Relief Request No. 2014 regarding relief from the Code-required exercise test frequency for emergency core cooling system (ECCS) testable check valves 1E12-F041A, B, C; 1E21-F006; and 1E22-F005. IP proposed to perform a partial-stroke exercise test of these valves during cold shutdowns and perform a full-stroke exercise test each refueling outage. The SE concluded that IP did not provide sufficient technical justification to support this relief request. As a result, Relief Request No. 2014 was denied.

As discussed in IP's April 3, 1992 letter, Relief Request No. 2014 has been revised to provide more technical justification for not performing a full-stroke exercise test of these valves during cold shutdown conditions. IP's April 3, 1992 letter provided revised Relief Request No. 2014 and requested its priority review. This revised relief request provides the additional justification required to address this anomaly. Revised Relief Request No. 2014 is reflected in the revised IST Program contained in Attachment 2.

Anomaly No. 12 (SE Section 3.3.1.2)

Anomaly No. 12 addresses Relief Request No. 2029 regarding an alternate method for verifying closure of check valves in air accumulator supply lines by performing a pressure drop test of the accumulator. The SE concluded that the proposed test method is acceptable provided acceptance criteria are identified in the IST Program and implementing procedures for these pressure drop tests. As a result, Relief Request No. 2029 was granted with provisions.

As stated in IP's April 3, 1992 letter, the IST Program and implementing procedures currently provide acceptance criteria for these pressure drop tests. As a result, no further actions are required for Relief Request No. 2029.

Anomaly No. 13 (SE Section 3.4.1.3)

Anomaly No. 13 addresses Relief Request No. 2030 regarding relief from the exercising frequency requirements of the Code for verifying closure of valves 1E12-F050A and F050B. IP proposed to exercise these valves to the closed position once every two years in conjunction with the Code-required leak rate test. The SE concluded that IP had not demonstrated the impracticality of exercising these valves to the closed position at the Code-specified frequency. As a result, Relief Request No. 2030 was denied for these valves.

Relief Request No. 2030 was withdrawn by IP's April 3, 1992 letter. As a result, IP will comply with the Code requirements for testing these valves.

Anomaly No. 14 (SE Section 3.4.2.1)

Anomaly No. 14 addresses Relief Request No. 2007 regarding relief from the stroke time measurement requirements of the Code for valve 1E12-F095. IP proposed to exercise this valve quarterly, but not measure its full-stroke time. The SE concluded that the proposed testing is not sufficient to monitor for degradation of this valve. However, the SE also concluded that

adequate time should be allowed to develop adequate means to monitor for degradation of this valve. As a result, Relief Request No. 2007 was granted on an interim basis until June 25, 1992.

As identified in IP's April 3, 1992 letter, IP has revised the IST Program to reflect that valve 1E12-F095 does not have an active safety function. Since this valve does not have an active safety function, stroke-time testing of this valve is not required by the Code and this relief request is no longer necessary. As a result, IP is now withdrawing Relief Request No. 2007. The revised IST Program provided in Attachment 2 reflects that valve 1E12-F095 no longer has an active safety function.

Anomaly No. 15 (SE Section 3.7.1.1)

Anomaly No. 15 addresses Relief Request No. 2020 regarding relief from the Code requirement to perform a full-stroke exercise test of testable check valve 1E51-F066. As stated in IP's April 3, 1992 letter, Relief Request No. 2020 was previously withdrawn. Withdrawal of this relief request was acknowledged by the NRC in the SE. As a result, IP will comply with the full-stroke exercise testing requirements of the Code for this valve.

Anomaly No. 16 (SE Section 3.7.1.2)

Anomaly No. 16 addresses Relief Request No. 2030 regarding relief from the exercising frequency requirements of the Code for closure of valve 1E51-F040. IP proposed to exercise this valve to the closed position once every two years in conjunction with the Code-required leak rate test. The SE concluded that IP had not demonstrated the impracticality of exercising this valve to the closed position at the Code-specified frequency. As a result, Relief Request No. 2030 was denied for valve 1E51-F040.

As discussed under IP's response to Anomaly No. 13, Relief Request No. 2030 was withdrawn by IP's April 3, 1992 letter. As a result, IP will comply with the Code requirements for testing this valve.

Anomaly No. 17 (SE Section 3.8.1.2)

Anomaly No. 17 addresses Relief Request No. 2030 regarding relief from the exercising frequency requirements of the Code for closure of valve 1C41-F006. IP proposed to exercise this valve to the closed position once every two years in conjunction with the Code-required leak rate test. The SE concluded that IP should full-stroke exercise this valve during cold shutdowns. However, the SE also concluded that adequate time should be allowed to develop procedures to verify closure of this valve during cold shutdowns. As a result, Relief Request No. 2030 was granted on an interim basis until June 25, 1992 for valve 1C41-F006.

As discussed under IP's responses to Anomaly Nos. 13 and 16, Relief Request No. 2030 was withdrawn by IP's April 3, 1992 letter. As a result, IP will comply with the Code requirements for testing valve 1C41-F006.

Anomaly No. 18 (SE Section 3.0.1.1)

Anomaly No. 18 addresses Relief Request No. 2017 regarding relief from the Code-required exercise test frequency for the reactor water cleanup system

isolation valves. IP proposed to exercise these valves each refueling outage. The SE concluded that IP had not demonstrated the impracticality of exercising these valves at the Code-specified frequency. As a result, Relief Request No. 2017 was denied.

Relief Request No. 2017 was withdrawn by IP's April 3, 1992 letter. IP will comply with the Code frequency requirements for testing these valves.

Anomaly No. 19 (SE Section 3.12.1.1)

Anomaly No. 19 addresses Relief Request No. 2026 regarding relief from the stroke-time measurement requirements of the Code for the diesel generator air start valves. IP proposed to exercise these valves during diesel generator tests and verify their proper operation by observing a decrease in the air receiver pressure. The SE concluded that IP had not provided acceptance criteria necessary to ensure that each of the redundant valves is operating properly nor did the proposed test method provide a means to monitor for or detect individual valve degradation. However, the SE also concluded that adequate time should be allowed to develop a means of monitoring for individual valve degradation. As a result, Relief Request No. 2026 was granted on an interim basis until June 25, 1992.

As discussed in IP's April 3, 1992 letter, the diesel generator air start valves are not ASME Code Class 1, 2, or 3 components. As a result, Relief Request No. 2026 was revised to indicate that it is associated with augmented testing requirements which are beyond the scope of 10CFR50.55a. As testing of the diesel generator air start valves is outside the scope of 10CFR50.55a, no further NRC review of Relief Request No. 2026 is necessary. Although not required to be reviewed by the NRC, revised Relief Request No. 2026 was provided for informational purposes in IP's April 3, 1992 letter and is reflected in the revised IST Program contained in Attachment 2.

Anomaly No. 20 (SE Section 3.9.3.1)

Anomaly No. 20 addresses Relief Request No. 2024 regarding alternate testing for the control rod drive system hydraulic control unit (HCU) valves. This anomaly notes that the justification provided in Relief Request No. 2024 does not specifically apply to the HCU No. 114 valves since they are Category C check valves which are not required to have their stroke times measured. This anomaly states that a more specific technical justification should be provided for these valves. Notwithstanding, Relief Request No. 2024 was granted.

As discussed in IP's April 3, 1992 letter, the control rod drive system HCU valves are not ASME Code Class 1, 2, or 3 components. As a result, Relief Request No. 2024 was revised to indicate that it is associated with augmented testing requirements which are beyond the scope of 10CFR50.55a. As testing of the control rod drive system HCU valves is outside the scope of 10CFR50.55a, no further NRC review of Relief Request No. 2024 is necessary. Although not required to be reviewed by the NRC, revised Relief Request No. 2024 was provided for informational purposes in IP's April 3, 1992 letter and is reflected in the revised IST Program contained in Attachment 2.

Anomaly No. 21 (SE Section 3.1.5.1)

Anomaly No. 21 addresses Relief Request No. 1001 regarding an allowable extension to the Code-specified test intervals for all pumps and valves contained in the IST Program. IP proposed allowing an extension of up to 25% to the Code-specified test intervals. The SE noted that the test interval extension should not apply to safety and relief valves which are tested once every five years in accordance with the schedule established by Table IWV-3510-1. Notwithstanding, Relief Request No. 1001 was granted.

As identified in IP's April 3, 1992 letter, Relief Request No. 1001 was revised to apply only to those tests which are required on a quarterly or shorter testing frequency. As the scope of this revised relief request is bounded by the scope approved in the SE, no further NRC review of revised Relief Request No. 1001 is required. Although not required to be reviewed by the NRC, revised Relief Request No. 1001 was included for informational purposes in IP's April 3, 1992 letter and is reflected in the revised IST Program contained in Attachment 2.

Summary

Based on the above discussion, a summary of the actions IP is requesting of the NRC in order to complete the review of the IST Program for CPS is provided below:

1. IP is requesting an extension to the required implementation date (beyond June 25, 1992) until the next test following August 26, 1992 for Relief Request No. 2012. (See Anomaly No. 9.) This extension is needed to allow sufficient time to complete procedure changes necessary to conform with NRC Generic Letter 89-04 per the revision to this relief request. This extension was previously requested in IP's April 3, 1992 letter.
2. IP is requesting an extension to the required implementation date (beyond June 25, 1992) for Relief Request No. 2011 until NRC review of new Relief Request No. 2034 is complete. (See Anomaly No. 4.) As described in Relief Request No. 2034 (see Attachment 2), IP believes that the current leak rate testing method for containment isolation valves (on a containment penetration basis rather than an individual valve basis) is sufficient to ensure that individual valve degradation will be detected in sufficient time to implement appropriate corrective actions.
3. IP is requesting an extension to the interim relief period (beyond June 25, 1992) for Relief Request No. 2008 (Rev. 2) until NRC review of revised Relief Request No. 2008 (Rev. 3) and new Relief Request No. 2033 is complete. (See Anomaly No. 8.) IP believes that continued sampling-based refueling outage disassembly and inspection provides sufficient assurance of valve operability until NRC review of these relief requests is complete. These extensions were previously requested in IP's April 3, 1992 letter.

4. Priority review is being requested for those relief requests which have been revised as a result of further discussion with the NRC. This request applies to revised Relief Request Nos. 2008 (Rev. 3), 2014 (Rev. 2), 3002 (Rev. 2), and 3006 (Rev. 1), and new Relief Request Nos. 2033 and 2034. These revised (and new) relief requests are reflected in the revised IST Program contained in Attachment 2. With the exception of new Relief Request No. 2034, priority review of these relief requests was requested in IP's April 3, 1992 letter.

No further action is being requested of the NRC for Relief Request Nos. 1001, 1002, 2007, 2017, 2020, 2021, 2024, 2026, 2027, 2029, 2030, 2031, and 2032. It should also be noted that Relief Request Nos. 1002, 2017, 2020, 2021, 2030, and 2031 were withdrawn by IP's April 3, 1992 letter and Relief Request Nos. 2007 and 2027 are being withdrawn via this letter. Withdrawal of these relief requests is reflected in the revised IST Program contained in Attachment 2.