Duquesne Light Company Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004

SUSHIL C. JAIN
Division Vice President
Nuclear Services
Nuclear Power Division

(412) 393-5512
Fax (412) 643-8069

March 28, 1996

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: Beaver Valley Power Station, Unit Nos. 1 and 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
IST Program Update: ASME/ANSI OMa-1988 Part 10

The purpose of this letter is to request approval to update the Beaver Valley Power Station, Unit Nos. 1 and 2 Inservice Test (IST) Programs to the requirements of ASME/ANSI Operations and Maintenance Standard OMa-1988 Part 10 for leak-rate testing of containment isolation valves. The applicable ASME Boiler and Pressure Vessel Code, Section XI, for Unit Nos. 1 and 2 is the 1983 Edition through Summer 1983 Addenda. The requirements for leak-rate testing of containment isolation valves are contained in paragraphs 4.2.2.2 and 4.2.2.3(e) and (f) of OMa-1988 Part 10. A similar request related to use of OM-10a was reviewed by the NRC under TAC No. M91515.

The Code of Federal Regulations (CFR), 10 CFR 50.55a(f) (4) (iv), provides for the inservice testing of pumps and valves to meet requirements set forth in subsequent editions and addenda of the ASME Code that are incorporated by reference in paragraph (b) of 10 CFR 50.55a. Reference to the 1989 Edition of ASME Section XI is included in 10 CFR 50.55a(b) (2). This edition of the ASME Code indicates that the rules for inservice testing of valves are as specified in the ASME/ANSI Standard OMa-1988 Part 10.

NRC issuance of Technical Specification (TS) Amendment Nos. 197 and 80 at Unit Nos. 1 and 2, respectively, allows implementation of Option B of Appendix J to 10 CFR Part 50 including implementing guidance of Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995. Option B of Appendix J permits implementation of a performance-based leak-rate test schedule in lieu of the prescriptive requirements contained in Option A of Appendix J.

DELIVERING QUALITY ENERGY

010140

A047 1/0

The Unit Nos. 1 and 2 IST Programs presently contain NRC approved relief requests to perform leak-rate testing of containment isolation valves in accordance with the following:

- 10 CFR 50, Appendix J, Type C
- 10 CFR 50, Appendix J, Type B
- ASME, Section XI, Paragraph IWV-3426, "Analysis of Leakage Rates"
- ASME, Section XI, Paragraph IWV-3427(a), "Corrective Actions."

A test frequency of 2 years (typically at refueling) is presently required for Type C valves. Those containment isolation valves contained in the personnel and emergency air locks are leak-rate tested in accordance with 10 CFR 50, Appendix J, Type B at a semi-annual frequency.

Approval to use paragraphs 4.2.2.2 and 4.2.2.3(e) and (f) of OMa-1988 Part 10 will permit the leak-rate testing of containment isolation valves in accordance with 10 CFR 50, Appendix J, inclusive of Option B. This will enable the upcoming air lock tests at Unit No. 2, presently scheduled to be completed by April 24, 1996, to be delayed to the sixth refueling outage scheduled for September 1996. It will also enable the ongoing refueling outage at Unit No. 1 to take advantage of Option B for leak testing Type B and C valves. It is, therefore, requested that the NRC grant approval to update the Unit Nos. 1 and 2 IST Programs to the requirements of ASME/ANSI Standard OMa-1988 Part 10 for leak-rate testing of containment isolation valves by April 21, 1996, in order to incorporate these changes into the IST Programs and implementing procedures in time to support the April 24, 1996, deadline at Unit No. 2.

If you have any questions regarding this request, please contact Mr. R. K. Brosi at (412) 393-5210.

Sincerely,

Sushil C. Jain

c: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. D. S. Brinkman, Sr. Project Manager