

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

January 28, 1985

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

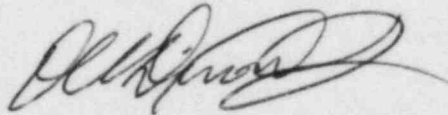
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Valve Test Relief Request
First Interval
Inservice Inspection Program

Dear Mr. Denton:

South Carolina Electric & Gas Company (SCE&G) submits the attached new Valve Test Relief Requests to the Valve Inservice Inspection Program for the Virgil C. Summer Nuclear Station, Unit No. 1. These Relief Requests are used in conjunction with General Test Procedure 302, "General Procedure for Inservice Testing of Valves." The Relief Requests submitted would provide alternatives to the ASME Code Section XI Requirements (IWV-3300) for performing visual verification of valve position. An alternate testing method from IWV-3300 is necessary because of inaccessibility of valves inside valve chambers, or the particular design of solenoid actuated valves.

If additional information is required, please contact us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

ARK:JWP:OWD/dwf
Attachments (4)

cc: V. C. Summer	C. A. Price
T. C. Nichols, Jr./O. W. Dixon, Jr.	C. L. Ligon (NSRC)
E. H. Crews, Jr.	K. E. Nodland
E. C. Roberts	R. A. Stough
W. A. Williams, Jr.	G. Percival
D. A. Nauman	C. W. Hehl
J. P. O'Reilly	J. B. Knotts, Jr.
Group Managers	NPCF
O. S. Bradham	File

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PDR ADOCK 05000395
Q PDR

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VALVE TEST RELIEF REQUESTS

J. SYSTEM: SAFETY INJECTION (SI)

J.26 Valves: XVG-8811A, XVG-8811B
Category: A
Class: 2A

Function: Containment Sump to RHR Pump Suction Isolation

Test Requirements: Valves with remote position indicators which, during plant operation, are inaccessible for direct observation shall be visually observed during a plant shutdown, at least once every two (2) years to verify that remote valve indications accurately reflect valve operation (IWV-3300 of Section XI of ASME Boiler & Pressure Vessel Code).

Basis for Relief: Valves are located inside large bolted valve encapsulation chambers which are an extension of Reactor Building Containment. Opening the chambers would violate containment integrity and can only be done during a refueling. Several weeks of additional work and testing would be required to remove the chambers to visually verify valve position resulting in undue equipment maintenance and undue personnel radiation exposure.

Alternate Test: Perform visual verification of valve position per IWV-3300 at least once every five (5) years during regularly scheduled maintenance. In addition, leak test and stroke test results which determine valve operability will be used to verify remote valve indication prior to the five (5) year program.

VALVE TEST RELIEF REQUESTS

K. SYSTEM: REACTOR BUILDING SPRAY (SP)

K.4 Valves: XVG-3004A, XVG-3004B
Category: A
Class: 2A

Function: Reactor Building Spray Sump Isolation Valve

Test requirements: Valves with remote position indicators which, during plant operation, are inaccessible for direct observation shall be visually observed during a plant shutdown, at least once every two (2) years to verify that remote valve indications accurately reflect valve operation (IWV-3300 of Section XI of ASME Boiler & Pressure Vessel Code).

Basis for Relief: Valves are located inside large bolted valve encapsulation chambers which are an extension of Reactor Building Containment. Opening the chambers would violate containment integrity and can only be done during a refueling. Several weeks of additional work and testing would be required to remove the chambers to visually verify valve position resulting in undue equipment maintenance and undue personnel radiation exposure.

Alternate Test: Perform visual verification of valve position per IWV-3300 at least once every five (5) years during regularly scheduled maintenance. In addition, leak test and stroke test results which determine valve operability will be used to verify remote valve indication prior to the five (5) year program.

VALVE TEST RELIEF REQUESTS

R. SYSTEM: HYDROGEN REMOVAL (HR)

R.4 Valves: X VX-6050A, X VX-6054
Category: A
Class: 2A

Function: Penetration 301 Isolation Valves

Test Requirements: Valves with remote position indicators which, during plant operation, are inaccessible for direct observation shall be visually observed during a plant shutdown, at least once every two (2) years to verify that remote valve indications accurately reflect valve operation (IWV-3300 of Section XI of ASME Boiler & Pressure Vessel Code).

Basis for Relief: Valves are solenoid actuator valves with no visible external means of verifying valve operation.

Alternate Test: Use leak test results of 10 CFR 50, Appendix J, once every two (2) years to verify proper valve closure.

VALVE TEST RELIEF REQUESTS

U. SYSTEM: SAMPLE SYSTEM (SS)

U.1 Valves: XVX-9339, XVX-9341,
 XVX-9356A, XVX-9356B, XVX-9357,
 XVX-9364B, XVX-9364C,
 XVX-9365B, XVX-9365C, XVX-9387,
 XVX-9398A, XVX-9398B, XVX-9398C

Category: A
Class: 2A

Function: Penetration Isolation Valves

Test Requirements: Valves with remote position indicators which, during plant operation, are inaccessible for direct observation shall be visually observed during a plant shutdown, at least once every two (2) years to verify that remote valve indications accurately reflect valve operation (IWV-3300 of Section XI of ASME Boiler & Pressure Vessel Code).

Basis for Relief: Valves are solenoid actuated valves with no visible external means of verifying valve operation.

Alternate Test: Use leak test results of 10 CFR 50, Appendix J, once every two (2) years to verify proper valve closure.