

FEB 14 1985

Docket Nos.: 50-440
and 50-441

Mr. Murray R. Edelman
Vice President - Nuclear Group
The Cleveland Electric Illuminating Company
P. O. Box 5000
Cleveland, Ohio 44101

Dear Mr. Edelman:

Subject: Staff Position Regarding Inservice Testing of Pumps and Valves
and Leak Testing of Pressure Isolation Valves in the Perry Nuclear
Power Plant (Units 1 and 2)

The staff has reviewed your program for the inservice testing of pumps and valves in the Perry plant, identified as Outstanding Issue (5) in the SER (NUREG-0887). Enclosure (1) indicates the staff's evaluation findings which we are documenting in SER Supplement No. 5 (in final preparation). This issue will be considered a license condition subject to the staff's completed detailed review. However, the relief requested from the 1980 Edition of the ASME Code, Section XI has been granted in the interim.

Enclosure (2) contains the staff's findings with respect to your letter dated April 9, 1984 responding to Q210.14. It is requested that the additional information required by the staff be furnished as soon as possible to enable the staff to reach a position regards surveillance requirements relief requested and finalizing appropriate Technical Specifications. Please advise the Perry Project Manager when we may expect to receive this additional information within 5 days after receipt of this letter.

Sincerely,

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B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosures:
As stated

cc: See next page

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<i>2/12/85</i>	<i>2/13/85</i>	<i>2/14/85</i>

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Sincerely,

A handwritten signature in black ink that reads "B. J. Youngblood".

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosures:
As stated

cc: See next page

PERRY

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Enclosure (1)
SER Supplement
Perry Unit 1, Docket No. 50-440

3.9.6 Inservice Testing of Pumps and Valves

To ensure that all ASME Code Class 1, 2 and 3 safety-related pumps and valves will be in a state of operational readiness to perform necessary safety functions throughout the life of the plant, a test program will be conducted which includes baseline preservice testing and periodic inservice testing. The program provides for both functional testing of the components in the operating state and for visual inspection for leaks and other signs of distress.

The inservice testing program for the above mentioned pumps and valves will meet the requirements of 10 CFR 50.55a(g), including the 1980 edition of the ASME Boiler and Pressure Vessel Code, Section XI through the Winter 1980 Addenda. The applicant has requested relief from these code requirements pursuant to 10 CFR 50.55a(g)(1) for certain pump and valve tests.

At this time we have not completed our detailed review of the applicant's submittal. However, we have evaluated the applicant's requests for relief which is contained in the attachment to a letter from Murray Edelman to J. Youngblood, "IST Testing of Pumps and Valves", dated June 15, 1983. Based on our review, we find that it is impractical within the limitations of design, geometry and accessibility for the applicant to meet certain of the ASME Code requirements. Imposition of those requirements would, in our review, result in hardships or unusual difficulties without a compensating increase in the level of quality of safety. Therefore, pursuant to 10 CFR 50.55a(g)(1), we believe that the relief that the applicant has requested from the pump and valve testing requirements of the 1980 Edition of ASME Section XI through the Winter 1980 Addenda should be granted until our detailed review is complete. If completion of our review results in additional testing requirements, we will require that the applicant comply with them.

Enclosure (2)
Leak Testing of Pressure Isolation Valves
Request for Additional Information

210. Mechanical Engineering Branch

The Surveillance Requirement pertaining to leak testing of pressure isolation valves (PIVs) presented in Section 4.4.3.2.2 of Perry Draft Technical Specification is not complete. In addition to the two requirements currently identified in Perry draft Technical Specification, Section 4.4.3.2.2, the staff requires the PIVS to be leak tested (a) prior to entering the Hot Shutdown whenever the plant has been in Cold Shutdown for 72 hours or more and if leakage testing has not been performed in the previous 9 months and (b) within 24 hours following valve actuation due to automatic or manual action or flow through the valve. Provide additional information to assure that the Perry plant has the following plant features: (1) full closure of PIV's is verified in the control room by direct monitoring position indicators, (2) inadvertent opening of PIV's is prevented by interlocks which require the primary system pressure to be below subsystem design pressure prior to openings, and (3) gross intersystem leakages into the low-pressure core spray, residual heat removal/low-pressure coolant injection, and residual heat removal/shutdown cooling return and suction lines would be detected by high-pressure alarms and increases in the suppression pool level. With these plant features in place, the PIV's are controlled and verified continuously rather than at the intervals specified in (a) and (b) above and then, the exception for relief from the surveillance requirements (a) and (b) could be accepted.