

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

April 16, 1996
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File No.: G09.16
10 CFR 50.55a

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

South Texas Project
Unit 1 and Unit 2
Docket Nos. STN 50-498 and 50-499
Request for Relief from ASME Boiler and Pressure Vessel Code Section XI
Valve Relief Request No. RR-55 and 56 (Unit 1) and
Valve Relief Request No. RR-51 and 52 (Unit 2)

Pursuant to 10 CFR 50.55a(f), the South Texas Project (STP) submits Valve Relief Requests (RR) RR-55 and RR-56 for Unit 1 and RR-51 and RR-52 for Unit 2 (Attachment 1 and 2) to use an alternate testing frequency in assessing operational readiness for various check valves in the Essential Cooling Water (ECW) and Standby Diesel Fuel Oil Systems (DO). Attachment 3 is provided to support the review.

The Nuclear Regulatory Commission (NRC) is in the process of evaluating a proposed change to the STP Technical Specifications that will allow an outage on each Standby Diesel Generator (SBDG) of sufficient length each operating cycle to perform maintenance normally performed in a refueling outage. Approval of these Relief Requests will allow STP to coordinate the inservice testing (IST) work with the planned SBDG maintenance and help minimize the total time the SBDGs are out of service.

STP has a refueling outage starting in May, 1996, in which we would like to implement this change. These Relief Requests, will help STP minimize the time the SBDGs are removed from service in this outage.

Upon NRC approval of these Relief Requests, STP will commence using these alternate testing intervals for the IST of the subject check valves and will revise the STP Unit 1 and Unit 2 Pump and Valve IST Plans.

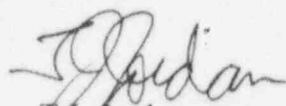
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Drawings located in Central Files

Should have any questions regarding this request, please contact Mr. W. Roger Harris at (512) 972-8475 or me at (512) 972-7902.



T.J. Jordan
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HRP/

- Attachment 1: Valve Relief Request RR-55
 Valve Relief Request RR-51

- Attachment 2: Valve Relief Request RR-56
 Valve Relief Request RR-52

- Attachment 3: Piping and Instrumentation Drawings:
 SBDG Fuel Oil Storage and Transfer and
 Essential Cooling Water Systems.

c: *

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* Above copies distributed without Attachment 3 except as noted by asterisk

ATTACHMENT 1
VALVE RELIEF REQUEST
RR-55 AND RR-56

STP UNIT 1 VALVE RELIEF REQUEST RR-55
STP UNIT 2 VALVE RELIEF REQUEST RR-51

Applicable Valves

EW-0370A, EW-0370B, and EW-0370C
EW-0403, EW-0404, and EW-0405

System

Essential Cooling Water (ECW)

Test Requirement

Exercise check valves for operability at least once every three (3) months.

Basis for Relief

- 1) The valves are currently inspected during cold shut-down in accordance with the code requirements of IWW-3522(a) because the inspection removes a train of ECW from service which also removes the associated Component Cooling Water, Residual Heat Removal, Essential Chilled Water, Spent Fuel Pool Cooling, and Standby Diesel Generators from service. Current Technical Specification Limiting Condition for Operation Allowed Outage Times are not sufficient to conduct the inservice test at power.
- 2) The South Texas Project expects to have a Special Test Exemption approved on the Standby Diesel Generators which will provide sufficient time to allow these inservice tests to be performed during the Special Text Exemption. The Special Test Exemption will permit a 21 day Standby Diesel Generator outage once per fuel cycle for each Standby Diesel Generator.
- 3) Allowing testing during these specific system outage windows will ensure component operability while minimizing safety system unavailability. The inspections will be performed at a nominal 18 month interval (typical STP fuel cycle length), although not necessarily in a refueling outage.

Alternate Testing

These check valves will be verified operable by disassembling one valve during the Essential Cooling Water LCO portion of the 18 month Standby Diesel Generator Special Test Exemption LCO window or refueling outage for inspection to ensure no degradation has occurred and to provide baseline data for the non-intrusive check valve testing program. The number of valves selected for disassembly during the 18 month Standby Diesel Generator Special Test Exemption LCO window or refueling outage will ensure that all valves in any sample group are disassembled and inspected within six years. This request for relief will not cause any additional equipment to be declared inoperable beyond that previously identified in South Texas Project Units 1 and 2, Docket Nos. STN 50-498, STN 50-499, Special Test Exception 3.10.8, TAC No. M92169/M92170.

ATTACHMENT 2
VALVE RELIEF REQUEST
RR-56 AND RR-52

STP UNIT 1 VALVE RELIEF REQUEST RR-56
STP UNIT 2 VALVE RELIEF REQUEST RR-52

Applicable Valves

DO-0056, DO-0062, & DO-0068
DO-0126, DO-0127, & DO-0128

System

Diesel Generator Fuel Oil Storage & Transfer (DO)

Test Requirement

Exercise check valves for operability at least once every three (3) months.

Basis for Relief

- 1) The valves are currently tested at refueling outages in accordance with the code requirements of IWV-3522(a) because the Standby Diesel Generators are required to be out of service to perform these inservice tests and current Technical Specification Limiting Condition for Operation Allowed Outage Times are not sufficient to conduct the inservice test.
- 2) The South Texas Project expects to have a Special Test Exemption approved on the Standby Diesel Generators which will provide sufficient time to allow these inservice tests to be performed during the Special Text Exemption. The Special Test Exemption will permit a 21 day Standby Diesel Generator outage once per fuel cycle for Standby Diesel Generator.
- 3) The inservice test will continue to be performed at a nominal 18 month interval (typical STP fuel cycle length), although not necessarily in a refueling outage.

Alternative Testing

One set of these check valves will be verified operable by back-seating the valves to verify they have closed. This process requires draining of 50 to 100 gallons of diesel fuel per test and inoperability of the associated diesel. The applicability of various non intrusive testing techniques are being evaluated for these small lift check valves. Should an acceptable technique be identified, it will be substituted for the method described above. This testing will be performed in conjunction with the 18 month Standby Diesel Generator Special Test Exemption LCO window or refueling outage. If any check valve is found inoperable, it shall be disassembled to determine the cause. The number of valves selected for testing each 18 month Standby Diesel Generator Special Test Exemption LCO window or refueling outage will ensure that all valves in any sample group are tested within six years. These check valves are operating in diesel oil which is a clean lubricating medium. STP has been testing these valves since 1991 and there have been no failures identified. Considering the mild service conditions these valve operate under, sampling one set of valves per Standby Diesel Generator Special Test Exemption LCO window or refueling outage will continue to demonstrate their operational readiness. This request for relief will not cause any additional equipment to be declared inoperable beyond that previously identified in South Texas Project Units 1 and 2, Docket Nos. STN 50-498, STN 50-499, Special Test Exception 3.10.8, TAC No. M92169/M92170.

ATTACHMENT 3

PIPING AND INSTRUMENT DRAWINGS:

SBDG FUEL OIL STORAGE AND TRANSFER SYSTEM (DO)

ESSENTIAL COOLING WATER SYSTEMS (ECW)

OVERSIZE DOCUMENT PAGE PULLED

SEE APERTURE CARDS

NUMBER OF OVERSIZE PAGES FILMED ON APERTURE CARDS 8

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