DMB-016

Docket No. 50-346

Mr. Richard P. Crouse Vice President, Nuclear Toledo Edison Company Edison Plaza - Stop 712 300 Madison Avenue Toledo, Ohio 43652 DISTRIBUTION

Docket File

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Dear Mr. Crouse:

SUBJECT: INSERVICE TESTING - JUSTIFICATION FOR SERVICE WATER OPERABILITY

The NRC issued, on May 18, 1984, a Safety Evaluation (SE) which presented the staff's evaluation of your revised Inservice Inspection Program, Parts 1 and 2 related to pumps and valves. Your submittals related to this program included a number of relief requests which were also evaluated in our review and discussed in the SE. One of the requests for relief related to quarterly reverse flow stroke testing of twenty service water system check valves. No alternative testing was proposed for these valves.

This request for relief from Section XI testing requirements of the ASME Boiler and Pressure Vessel Code was denied. Item II.B.2.M of our SE requested you to propose alternate testing for these valves and to submit a reasonable basis for assuming system operability until planned modifications can be completed to permit the required testing.

On August 14, 1984 (No 1067) Toledo Edison Company responded to this request. This response indicated that five of these valves are currently being reverse - flow tested. This closure testing is in accordance with code test requirements. For the remaining fifteen valves, no alternate testing was proposed. Instead, the code test requirements have been obviated by modifying system valve lineups and operating procedure to eliminate the safety related function of the check valves. In addition, the internals of one of these check valves were removed.

The staff has reviewed this submittal and has concluded that your testing of five check valves in accordance with the code and your alternate measures to eliminate code test requirements for fifteen check valves are acceptable. This resolves our concerns raised in Paragraph II.B.2.M of our SE dated May 18. 1994. The SE supporting this conclusion is enclosed.

Sincerely,

JOHN F. STULZ\*

John F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing

cc w/enclosure: See next page

prince

Toledo Edison Company cc w/enclosure(s):

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