



OLIVER D. KINGSLEY, JR.
Vice President
Nuclear Operations

February 12, 1988

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Pump and Valve Inservice Testing
Program - Relief Request
AECM-88/0022

Reference: NRC MAEC-86/0084 letter to Oliver D. Kingsley, Jr. dated
March 27, 1986.

This submittal requests relief from the requirements of ASME Section XI in accordance with 10CFR50.55a(g) 5(iii). Relief was granted for similar valves (F006, F007) in the Standby Liquid Control System (SLCS) by the referenced letter. This submittal revises the relief granted to include an additional check valve (F222).

During the second refueling outage an additional check valve (F222) was added to the SLCS. This valve provides additional SLCS isolation from reactor coolant pressure.

ASME Section XI requires check valves be exercised every three months (IWV-3520). If exercising a check valve during normal operation is impractical, exercising during cold shutdown is required (IWV-3522). Exercising the SLCS check valves requires firing the squib (explosive) valves. The squib valves are required to be fired at least once per 18 months by Technical Specifications. Firing the squib valves every 3 months or during cold shutdown is not practical.

The Inservice Testing Program requires the F006 and F007 check valves be exercised during a refueling outage. There have been no problems identified that would have prevented the valves from performing their safety function. Therefore, a testing frequency of cold shutdown is not necessary.

Please find attached the revised relief request (C41-1) and a drawing showing the location of the three check valves in SLCS.

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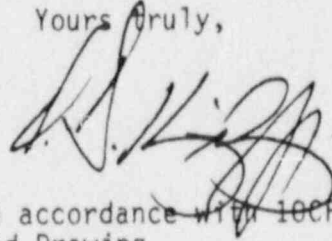
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If additional information is required to support your review, please contact this office.

Yours truly,

A handwritten signature in black ink, appearing to be "D. J. Nelson", written over the typed name "Dr. J. Nelson" in the distribution list below.

ODK:bms

Attachments: 1) \$150 application fee in accordance with 10CFR170.21
2) Relief Request C41-1 and Drawing

cc: Mr. T. H. Cloninger (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
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SYSTEM ENERGY RESOURCES, INC.
GRAND GULF NUCLEAR STATION, UNIT 1
PUMP AND VALVE INSERVICE INSPECTION PROGRAM

SPECIFICATION SERI-M-189.1
REVISION NO.:
PAGE: C41-1

RELIEF REQUEST C41-1, REV. 1
PAGE 1 OF 2
STANDBY LIQUID CONTROL SYSTEM

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- I. Component: Stop check valves Q1C41-F006, Q1C41-F007, and Q1C41-F222.
- IWV-1100 FUNCTION: F006 and F007 are closed for drywell isolation and F222 is closed for system isolation (design considerations). All three valves open for SLC injection.
- IWV-2200 CATEGORY: C
- ASME SECTION III CLASS: 1
- II. Code: The valves were designed and fabricated to ASME Section III, Class 1 requirements. Inservice testing is performed in accordance with ASME Section XI, 1980 Edition through and including the Winder 1980 Addenda.
- III. Code Requirements: Class 1 Category C valves are required to be exercised at least once every 3 months in accordance with ASME Section XI, IWV-3520. Additional exemption statements in IWV-3522 allow testing during cold shutdown when valves cannot be exercised during plant operation.
- IV. Information to support the determination that the code requirements are impractical:
- These valves are located in the SLC system injection line downstream of the squib (explosive) valves. The F006 valve is located in containment and the other two valves are in the drywell. All three valves are normally closed and have a safety function in both the closed and open positions.
- Testing the valves to the open position is performed by initiation of SLC system injection through the valves and verifying that the required flowrate is obtained. This requires firing of the squib valves and their subsequent replacement. All three stop check valves are tested closed by use of their handwheels to ensure that the disks are on their seats.
- V. Specific relief requested: Permission is requested to exercise these valves to the open (and closed) position during each refueling in lieu of every 3 months or every cold shutdown.

SYSTEM ENERGY RESOURCES, INC.
GRAND GULF NUCLEAR STATION, UNIT 1
PUMP AND VALVE INSERVICE INSPECTION PROGRAM

SPECIFICATION SERI-M-189.1
REVISION NO.:
PAGE: C41-2

RELIEF REQUEST C41-1, REV. 1 (CONTINUED)
PAGE 2 OF 2
STANDBY LIQUID CONTROL SYSTEM

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- VI. Reason why relief should be granted: Relief should be granted for the following reasons:
1. To test the valves open during normal operation will require injection of demineralized water and firing of SLC system squib valves. This will cause at least one subsystem of SLC to be inoperable during test and remain inoperable until explosive valve charges are replaced and valve lineups returned to standby.
 2. To test drywell valves closed will require the use of a valve handwheel. The drywell is not accessible during normal operation for valve handwheel operation.
 3. In order to determine that the valve has closed on cessation or reversal of flow, the valve handwheel is used to check that the valve is closed. This test needs to be performed after the valve has been opened. Because these valves are only opened during SLC injection they should only be tested closed after SLC injection.
- VII. Alternate testing: These valves will be tested to the open position each refueling during SLC injection required by the GGNS Technical Specifications. The valves will be tested closed by use of the handwheel after each SLC injection.