



1901 Gratiot Street, St. Louis

Donald F. Schnell
Vice President

May 5, 1988

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

ULNRC-1769

DOCKET NUMBER 50-483
CALLAWAY PLANT
CALLAWAY PUMP AND VALVE INSERVICE TESTING PROGRAM
Reference: ULNRC-1756, dated April 12, 1988

The referenced letter submitted updates to the Callaway Pump and Valve Inservice Testing (IST) Program. Included as an attachment to this letter are relief requests V06, P03, and P09 which are being resubmitted in a revised format. These changes were requested by the NRC in an April 29, 1988 telephone conversation. Revision bars in the margin denote the areas of change.

If you have any questions regarding this letter, please contact us.

Very truly yours,

for Robert F. Schnell
Donald F. Schnell

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Attachment

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PDR ADOCK 05000483
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cc: Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Dr. J. O. Cermak
CFA, Inc.
4 Professional Drive (Suite 110)
Gaithersburg, MD 20879

W. L. Forney
Chief, Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

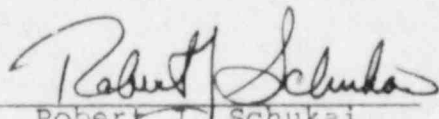
Bruce Little
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

Tom Alexion (2)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 316
7920 Norfolk Avenue
Bethesda, MD 20014

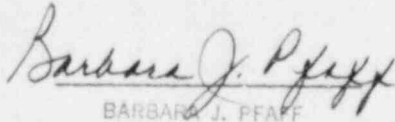
Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (Nuclear) for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By 
Robert J. Schukai
General Manager-Engineering
Nuclear

SUBSCRIBED and sworn to before me this 5th day of May, 1988.


BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1989
ST. LOUIS COUNTY

RELIEF REQUEST # V06

VALVE: BB-PCV-0455A, -0456A

CATEGORY: A

CLASS: 1

TEST REQUIREMENT: ASME Section XI IWV-3417(a) corrective action shall be applied to all power operated valves.

BASIS FOR RELIEF: The trending requirements of IWV-3417(a) specifies that valve test frequencies shall be increased to monthly for valves with stroke times 10 seconds or less when stroke times increase by 50%. Valves normally stroking rapidly can increase by 50% and show a relatively small numerical stroke time increase, thereby not indicating degradation.

ALTERNATE TESTING: Power operated valves with maximum stroke times of 2 seconds will be exempted from the corrective action and trending requirements of Section XI IWV-3417(a). A limiting stroke time of 2 seconds will be assigned to these valves. Valves exceeding this limit will be corrected in accordance with IWV 3417(b).

RELIEF REQUEST # P03

SYSTEM: Chemical and Volume Control System

COMPONENT: PBG05A and PBG05B

CLASS: 2

FUNCTION: To provide high head safety injection to the reactor.

TEST REQUIREMENT: The resistance of the system shall be varied until either the measured differential pressure or the measured flowrate equals the corresponding reference value.

BASIS FOR RELIEF: Technical Specification 4.5.2.f.1 states "Each ECCS Subsystem shall be demonstrated OPERABLE by verifying that each centrifugal charging pump develops a discharge pressure greater than or equal to 2390 psig on recirculation flow when tested pursuant to Specification 4.0.5." Testing of these pumps is performed on the fixed resistance mini-flow path (2500 psid, 60 gpm). At this flow rate, the pump curve for these pumps is relatively flat (25 psid/60 gpm). Flow rate changes of $\pm 50\%$ would result in less than 1% change in pump differential pressure. Based on this, we do not feel it is warranted to install additional instrumentation to ensure flow is maintained at the same point ($\pm 2\%$ accuracy) for each quarterly test. Adequate flow is verified for protection of the pumps by monitoring discharge pipe temperature changes. To further verify pump performance and monitor degradation, we will run an additional test, on a refueling frequency, at or above the design flow point for the pumps and monitor pump flowrate, differential pressure, and vibration. The flow measurement to be performed during these outages will be done utilizing an alternate flow path which is only available during outage conditions and has installed flow instrumentation. This flow instrumentation meets the requirements of ASME Section XI Subsection IWP.

ALTERNATE TESTING: Pump differential pressure and vibration will be measured and trended quarterly. A second set of reference values will be established at or above the pumps' design flow point (462 gpm). Pump differential pressure, flowrate, and vibration will be measured on a refueling frequency and trended against this second set of reference values.

RELIEF REQUEST # P09

SYSTEM: Chemical and Volume Control System

COMPONENT: PBG02A and PBG02B

CLASS: 3

FUNCTION: To provide emergency boration.

TEST REQUIREMENT: The resistance of the system shall be varied until either the measured differential pressure or the measured flowrate equals the corresponding reference value.

BASIS FOR RELIEF: Quarterly testing of these pumps if performed on the fixed resistance mini-flow path (112 psid, 15 gpm). At this flowrate, the pump curve for these pumps is relatively flat (8 psid/42 gpm). Flowrate changes of $\pm 25\%$ would result in less than a 1% change in pump differential pressure. Based on this, we do not feel it is warranted to install additional instrumentation to ensure flow is maintained at the same point ($\pm 2\%$ accuracy) for each quarterly test. Adequate flow is verified for protection of the pumps by monitoring discharge pipe temperature changes. To further verify pump performance and monitor degradation, we will run an additional test, on a cold shutdown frequency, at or above the design flow point for the pumps and monitor pump differential pressure, flowrate, and vibration. The flow measurement to be performed during these outages will be done utilizing an alternate flow path which is only available during outage conditions and has installed flow instrumentation. This flow instrumentation meets the requirements of ASME Section XI Subsection IWP.

ALTERNATE TESTING: Pump differential pressure and vibration will be measured and trended quarterly. A second set of reference values will be established at or above the pump design flow point (75 gpm). Pump differential pressure, flowrate, and vibration will be measured on a cold shutdown frequency and trended against this second set of reference values.