

10 CFR Part 50.55a(g)(4)(ii) requires that licensees update their pump and valve Inservice Testing (IST) programs to the latest approved edition of Section XI of the ASME Code (the code) every 10 years. Since the regulations define the start of the initial 10-year interval as the date of the facility's commercial operation, licensees with multi-unit sites often have the IST program for each unit structured to a different edition of the code. This can create administrative difficulties for the licensee in keeping track of two sets of requirements for only nominal technical differences in testing requirements.

By letter dated March 3, 1988, the licensee requested an exemption to the requirements of 10 CFR Part 50.55a(g)(4)(ii) which would allow a common IST start date for both NA-1&2. That common start date would be achieved by extending the termination date of the NA-1 IST program to coincide with the termination date of the NA-2 IST program. The NA-1 IST program would be extended to terminate on December 14, 1990, rather than on June 6, 1988.

III.

The Commission's staff has reviewed this request and has determined that a common IST date for NA-1&2 has inherent administrative, technical, and cost-saving advantages, for both the licensee and the NRC. The staff has also determined that:

1. Since the units are basically the same, only one IST program would have to be written and submitted by the licensee;
2. The proposed exemption would provide a degree of IST that is equivalent to that required by 10 CFR 50.55a(g)(4)(ii) such that there would be no increase in the risk of failure for operational readiness of pumps and valves whose function is required for safety at these facilities. Accordingly, the underlying purpose of 10 CFR 50.55a(g)(4) will continue to be achieved.

If a common start date were not established, the IST program would be accomplished utilizing two different ASME Code editions. Performing IST at both plants using only one program results in uniform procedures for both plants and can reduce the chance of personnel errors in the performance of the testing requirements.

Although the revision of the NA-1 IST program will be delayed approximately 2 years, the staff believes that the use of a single IST program for both NA-1&2 has distinct advantages in term of manpower requirements and should result in increased plant safety through simplification and standardization of plant testing procedures.

The purpose of the rule is to assure periodic updating of IST practices to conform to advances in industry in order to assure continued operability of pumps and valves required for safe operation. The 10-year cycles were selected as reasonable periods for periodic updating. In the present case, extension of the period for approximately two years would not affect NA-1&2 safety. Changes from updating on June of 1988 are not expected to affect operational capability of pumps and valves whose function is required for safety at NA-1&2. Thus, extension of the updating of the 10-year period until December 1990 is not necessary to achieve the underlying purpose of the rule.

IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12(a), the exemption requested by the licensee's letter of March 3, 1988 is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest and that special circumstances are present as set forth in 10 CFR 50.12(a)(2)(ii). The

Commission hereby grants the licensee an exemption from the requirements of 10 CFR 50.55a(g)(4) as it relates to the NA-1 120-month inspection interval for inservice examination of components, inservice tests to verify operational readiness of pumps and valves, and system pressure tests.

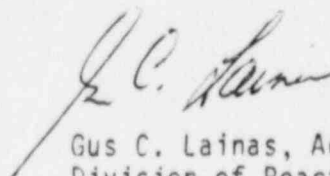
Pursuant to 10 CFR 51.32, the Commission has determined that granting of this exemption will have no significant impact on the environment (April 26, 1988, 53 FR 14873).

A copy of the licensee's request for exemption and supporting documentation dated March 3, 1988 is available for public inspection at the Commission's Public Document Room, 1717 H Street, NW, Washington, DC and at the Board of Supervisors Office, Louisa County Courthouse, Louisa, Virginia 23093 and the Alderman Library, Manuscripts Department, University of Virginia, Charlottesville, Virginia 22901. Copies may be obtained upon written request to the U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Director, Division of Reactor Projects I/II.

This exemption is effective upon issuance.

Dated at Rockville, Maryland this 26th day of April 1988.

FOR THE NUCLEAR REGULATORY COMMISSION



Gus C. Lainas, Acting Director
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