



LOUISIANA
POWER & LIGHT

317 BARONNE STREET • P. O. BOX 60340
NEW ORLEANS, LOUISIANA 70160 • (504) 595-3100

September 22, 1988

W3P88-1261
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QA

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Pump and Valve Inservice Test Plan, Revision 6

Reference: LP&L letter W3P88-0045 dated 4/4/88, R.F. Burski to NRC
Document Control Desk, subject: Pump and Valve Inservice Test
Plan, Revisions 4 and 5

In accordance with 10CFR50.55a(g), "Inservice Inspection Requirements", Louisiana Power & Light Company hereby submits Revision 6 to the subject Test Plan which is prepared in accordance with the ASME Code Section XI, 1980 Edition with Addenda through Winter 1981. Revision 6 consists of five additional Relief Requests and a number of enhancements and additions to the plan. Specifically, one previous Relief Request is revised as shown in the attachment to this letter, and one Relief Request was deleted. The additional Relief Requests will be implemented into the Test Plan upon approval by your staff.

A copy of the entire Revision 6 of the Test Plan is being submitted at this time due to the complete plan being reformatted and retyped. The changes made in this revision do not decrease the effectiveness of the Plan.

The attachment to this letter provides a summary of the changes to the Test Plan in Revision 6. Change bars are provided in the page margins of the Plan to indicate the changes made in these revisions.

The referenced letter indicated that there was a typographical error in Revision 5 for three component cooling water valves. The typo identified the test legend for the subject valves as CSR (exercise check valve partial stroke at each cold shutdown and full stroke at each reactor refueling outage) instead of CS (exercise valve full stroke for operability during each cold shutdown and each refueling outage).

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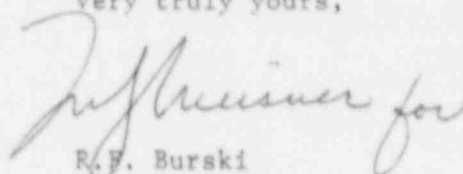
As previously stated, the CS test method has been the test performed on the subject valves in accordance with ASME XI Article IWV-3522. However, the CS test legend is currently used to identify alternate valve testing (i.e. testing performed in accordance with approved relief requests or testing performed in an unusual or complicated manner subject to clarification). As appropriate, Revision 6, Pump and Valve Inservice Test Plan Attachment 6.5 pg. 3 of 90 "Legend for Valve Testing Requirements" provides the test legend for the subject valves as CC (exercise valve full stroke for operability during each cold shutdown) as allowed in Section XI Article IWV-3522.

It is hereby requested that the subject Test Plan be approved and the ASME Section XI code relief requested be granted pursuant to Section 50.55a(g)(6)(1) of 10CFR50.

Also enclosed with this submittal is the application fee of \$150 pursuant to the requirements of 10CFR170.

Should you have any questions, please contact me or L.W. Laughlin at (504) 464-3499.

Very truly yours,



R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB:8GM:ssf

Enclosure

Attachment

cc (w/enclosure): R.D. Martin, NRC Region IV
NRC Resident Inspectors Office

cc (w/o enclosure): J.A. Calvo, NRC-NRR
D.L. Wigginton, NRC-NRR
E.L. Blake
W.M. Stevenson

Major Changes contained in
LP&L Pump and Valve Inservice Test Plan Revision 6

1. Changed the format of the entire Plan.
2. pages 1-6; a general rewrite of the introductory information was done, it is the same basic information as contained in Revision 5 to the Plan.
3. Added Relief Request 2.1.5 (pg. 42) to no longer take bearing temperature measurements annually for the following pumps:
 - Containment Spray
 - High Pressure Safety Injection
 - Low Pressure Safety Injection
 - Component Cooling Water
 - Auxiliary Component Cooling Water
 - Emergency Feedwater
 - Charging
 - Boric Acid
 - Chilled Water
4. Added Relief Request 2.1.4 (pg. 41) to expand high value alert and required action ranges for flow and dp for the following pumps:
 - Containment Spray
 - High Pressure Safety Injection
 - Low Pressure Safety Injection
 - Component Cooling Water
 - Auxiliary Component Cooling Water
 - Emergency Feedwater
 - Boric Acid
 - Chilled Water
5. page 43; added Relief Request 2.1.6 to allow for pressure instrument accuracy and range combinations.
6. page 46; added Ball Valve to Valve Legend.
7. page 45; revised system list, added index to locate valves by system.
8. page 47; added 'CC' (Exercise valve (full stroke) for operability during each cold shutdown as allowed in Section XI, Article IWV-3522) to Valve Testing Legend.
9. page 48; NOTE removed from Legend for Alternate Valve Testing.
10. page 53; corrected CVC-103 valve type to GL.
11. page 55; corrected Test Requirement for valves CVC-221A and B to CC.

12. page 69; eliminate minimum stroke time limit for SI-405A and B.
13. Deleted valve EFW-220A and B and FW-179A and B from program because they serve no safety function.
14. page 78; the stroke time for FW-173A and B was changed from "2.3 to 5" to "3".
15. page 79; the stroke time for FW-184A and B was changed from "2.3 to 5" to "3".
16. page 89; for CC-181A and B, the test requirement was changed from CSR to CC.
17. page 90; moved previous valve numbers for ACC-139A and B, and ACC-140A and B from the introductory pages before the valve tables to the valve table for Auxiliary Component Cooling Water.
18. page 95; for CC-644 changed CSR Test Requirement to CC and LT.
19. page 98; added valve CAR-200B to the Plan, it was installed by SM-1322.
20. page 99; for CAR-202B changed valve type from B to BL by SM-1322.
21. pages 108 and 109; corrected valve numbers for the Instrument Air Supply to Nitrogen Header Check Valves.
22. page 130; changed the following valve numbers:

from PSL-404A	to	SSL-8004A
from PSL-404B	to	SSL-8004B
from PSL-406A	to	SSL-8006A
from PSL-406B	to	SSL-8006B
23. page 145; Revised Relief Request 3.1.16 by deleting reference to first refueling and applied for relief request.
24. Drawing List was removed.
25. Added Relief Request 3.1.55 for numerous valves for measuring stroke time to the nearest second.
26. Added Relief Request 3.1.56 for numerous rapid-acting valves.
27. page 34; diagram was updated to include flow elements.
28. page 35; diagram was updated to include flow elements.
29. Deleted Relief Request 3.1.50 because EFW-220A and B, and FW-179A and B are no longer in test plan.