

October 6, 1988

Docket Nos.: 50-369
and 50-370

Mr. H. B. Tucker, Vice President
Nuclear Production Department
Duke Power Company
422 South Church Street
Charlotte, North Carolina 28242

Dear Mr. Tucker:

SUBJECT: INSERVICE TESTING POSITION ON POWER-OPERATED RELIEF VALVES -
MCGUIRE NUCLEAR STATION, UNITS 1 AND 2 (TACS 61271 and 61272)

During an August 16, 1988, meeting on the McGuire pump and valve inservice testing (IST) program, NRC referenced prior correspondence on the Fort Calhoun Station for the NRC's position on exercising the power-operated relief valves (PORVs) and PORV block valves. A copy of that correspondence is enclosed. The relevant position, stated on page 2 of the enclosure, is equally applicable to the McGuire IST program.

We trust the above position will assist in resolution of the associated unresolved item identified in our September 8, 1988 IST Meeting Summary (paragraph S.1, page 17) on McGuire.

Sincerely,

Darl S. Hood, Project Manager
Project Directorate II-3
Division of Reactor Projects I/II

Enclosure:
NRC 12/1/87 letter to R. L. Andrews

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 6, 1988

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and 50-370

Mr. H. B. Tucker, Vice President
Nuclear Production Department
Duke Power Company
422 South Church Street
Charlotte, North Carolina 28242

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MCGUIRE NUCLEAR STATION, UNITS 1 AND 2 (TACS 61271 and 61272)

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We trust the above position will assist in resolution of the associated unresolved item identified in our September 8, 1988 IST Meeting Summary (paragraph S.1, page 17) on McGuire.

Sincerely,

A handwritten signature in dark ink that reads "Darl S. Hood". The signature is stylized with a large, sweeping initial "D" and "H".

Darl S. Hood, Project Manager
Project Directorate II-3
Division of Reactor Projects I/II

Enclosure:
NRC 12/1/87 letter to R. L. Andrews

cc w/enclosure: -
See next page

Mr. H. B. Tucker
Duke Power Company

McGuire Nuclear Station

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
December 1, 1987

ENCLOSURE

Docket No. 285

Mr. R. L. Andrews
Division manager - Nuclear Production
Omaha Public Power District
1623 Harney Street
Omaha, Nebraska 68102

Dear Mr. Andrews:

SUBJECT: NRC OPEN ITEMS AS A RESULT INSERVICE TESTING PROGRAM MEETING -
FORT CALHOUN STATION, UNIT 1 (TAG 54804)

As a result of meetings held with you on October 14 and 15, 1987 on your inservice testing (IST) program at the Fort Calhoun Station, minutes of the meetings were sent to you dated November 16, 1987. As was indicated by the minutes of the meeting, these discussions resulted in three open items for the NRC to address and fourteen open items for you to address. The following addresses the NRC three open items and our position on them. The numbers are delineated according to the minutes of the meeting.

Section No.

- G 7 You stated that no credit is taken for the operability of the charging pumps in any accident scenario. However, your Technical Specification Section 2.2(2) defines the operability of at least two charging pumps as a condition necessary to assure safe reactor operation. Moreover, Section 6.2 of the USAR states that "SIAS aligns the charging pumps in the chemical and volume control system to take suction from the concentrated boric acid storage tanks". A similar statement on the actuation of these pumps following a SIAS is made in USAR Section 9.2.3.7. It appears that the charging pumps have a safety related function and, therefore, the charging pumps and the valves in the applicable flow paths should be included in the IST program and tested to the Code requirements to the extent practical.
- H 11 With regard to valves SI-175 and SI-176, you stated that the containment spray system is redundant to the containment air filtration and cooling system and, therefore, need not be exercised. A staff review of USAR Section 6.4.5, however, indicates that both the sprays and the containment coolers are needed for sufficient containment cooling capacity in the event of a design basis accident involving LOSP and failure of one emergency diesel. Accordingly, the staff's position is that these valves should be exercised.

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- L 1 The NRC position is that the pressurizer power operated relief valves (PORVs) should be included in the IST program as Category B valves and tested to the requirements of Section XI. However, since the PORVs have shown a high probability of sticking open and are not needed for overpressure protection during power operation, the NRC has concluded that the IWV-3410 provisions for exercising quarterly during power operation is "not practical" and, therefore, not required by 10 CFR 50.55a(g).

The PORVs' function during reactor startup and shutdown is to protect the reactor vessel and coolant system from low-temperature over-pressurization conditions and should be exercised prior to initiation of system conditions for which vessel protection is needed. Exercising of the PORVs should be performed after the operability of the block valves is assured by exercising and stroke timing. The following test schedule is required:

- a. Full-stroke exercising should be performed at each cold shutdown or, as a minimum, once each refueling cycle.
- b. Stroke timing should be performed at each cold shutdown, or as a minimum, once each refueling cycle.
- c. Fail-safe actuation testing should be performed at each cold shutdown.
- d. The PORV block valves should be included in the IST program and tested quarterly to provide protection against a small break LOCA should a PORV fail open.
- e. In case of frequent cold shutdowns, testing of the PORVs is not required more often than each three months.

The above clarifications should be included in your Fort Calhoun Station IST resubmittal.

If you have any questions regarding this matter please contact me at (301) 492-7591. The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

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Anthony Bournia, Project Manager
 Division of Reactor Projects - III
 IV, V and Special Projects
 Office of Nuclear Reactor Regulation

cc: See next page

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 Project Manager
 OGC-Bethesda

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 ARCS (10)

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Mr. R. L. Andrews
Omaha Public Power District

Fort Calhoun Station
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cc:

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