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May 28, 1986
RBG-23789
File Nos. G9.5, G9.25.1.5

Mr. Robert D. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Dear Mr. Martin:

River Bend Station - Unit 1
Docket No. 50-458

Attached for your information is a report containing a brief description of changes to the River Bend Station (RBS) initial test program (ST-24 and ST-30D) and a summary of the safety evaluation for each change. This report is provided with regard to the RBS Facility Operating License NPF-47, Section 2.C(12).

Sincerely,

J. E. Booker

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

JEB/ERG/DAS/je

cc: Director of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ATTACHMENT 1

Summary Description of Change
(ST-24)

Section 14.2.12.3.21 of the River Bend Station Final Safety Analysis Report (FSAR) describes the Turbine Valve Surveillance Test (ST-24). The purpose of this test is to demonstrate the acceptable procedures and maximum power levels for surveillance testing of the main turbine control, stop and bypass valves without producing a reactor scram. This change reschedules turbine valve surveillance testing from Test Condition 3 (TC-3) to testing along the 100% Rod Line in TC-5 and between TC-5 and TC-6.

Discussion

In order to determine the maximum power level at which the surveillance testing can be performed without causing a reactor scram, it is necessary to perform testing along the 100% Rod Line in TC-5 and between TC-5 and TC-6. From this data the highest power level for surveillance can be extrapolated. It is not necessary to perform this test during TC-3 since the plant will not be along the 100% Rod Line and will therefore not provide any useful data in determining the maximum power level for surveillance.

The testing performed at TC-5 and TC-6 fully satisfies the intent of this test procedure and this change does not affect the acceptance criteria. Since the method of testing and acceptance criteria remain the same, the objectives of this test are still fully met.

Conclusion

The testing to determine the maximum power level at which surveillance testing of the main turbine control, stop and bypass valves can be performed must be determined along the 100% Rod Line. Since the plant will not be along the 100% Rod Line during TC-3, it would not provide any useful data for the maximum surveillance power level determination and it can therefore be eliminated. This maximum power level for surveillance will be fully determined with the testing at TC-5 and TC-6.

Since the acceptance criteria and the method of testing is not changed, the intent of the test is fully met. This change does not involve an unreviewed safety question since all valves to be tested have already been shown to function properly in previous testing and the data obtained at TC-3 is of no use for determining the maximum power level for surveillance. Therefore, this change can be implemented.

ATTACHMENT 2

Summary Description of Change
(ST-30D)

Regulatory Guide 1.68 (Revision 2, August 1978), Appendix A, paragraph 5.s requires that the recirculation flow control system be calibrated as necessary and its performance verified. One function of the recirculation flow control system is to provide a recirculation flow runback upon the coincident loss of one feedwater pump and low water level (level 4) indication to avoid a scram on low-low water level (level 3). Startup Test 30D, Recirculation Runback, simulates a loss of feedwater pump at Test Condition 3 near rated recirculation flow to determine the adequacy of the recirculation flow runback feature in preventing a scram. This change performs this test in conjunction with Startup Test 23C, Feedwater Pump Trip, at Test Condition 6. This testing will demonstrate that Regulatory Guide 1.68, Appendix A, paragraph 5.s objectives are met for the recirculation flow runback feature of the recirculation flow control system.

Discussion

Response of the system during a feedwater pump trip with recirculation runback is determined by analyzing test data and comparing to acceptance criteria which define the required system performance. For the recirculation flow runback test, the recirculation flow control valves are required to runback upon a trip of the runback circuit. During Startup Test 23C, Feedwater Pump Trip at Test Condition 6, a recirculation flow runback occurs as the result of the feedwater pump trip. This testing results in an actual demonstration of the recirculation runback circuit under real, as opposed to simulated, conditions. In addition, the recirculation flow runback test is not required to verify FSAR analysis results since the feedwater pump trip analysis does not take credit for the automatic runback feature.

Conclusion

Testing of the recirculation flow runback feature in conjunction with the Feedwater Pump Trip (ST-23C) at Test Condition 6 demonstrates the actuation of the recirculation runback circuits and provides demonstration of the adequacy of the runback feature to prevent a scram. This changed testing satisfies the objectives of Regulatroy Guide 1.68, Appendix A, paragraph 5.s for the recirculation flow runback feature of the recirculation flow control system and will not adversely affect any safety related systems or safe operation of the plant and therefore does not involve an unreviewed safety question. Therefore, the performance of the reciruclation flow runback feature can be demonstrated in conjunction with Startup Test 23C, Feedwater Pump Trip, at Test Condition 6.