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JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

October 18, 1988

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Caivert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
ASME Section XI Pump and Valve Inservice Test (IST) Program

REFERENCE: (a) Letter from Mr. S. A. McNeil (NRC) to Mr. J. A. Tiernan (BG&E),
dated August 9, 1988, Request for Additional Information
(TACS 64976 and 64977)

Gentlemen:

This letter constitutes our reply to Reference (a). As requested, a complete, revised IST program plan is enclosed. Our response to the Request for Additional Information (RAI) is discussed below.

Enclosure (1) provides a detailed discussion in response to Valve Program Item No. 1 and Pump Program Item No. 1. We are not including the emergency diesel generator air start and fuel oil transfer systems in our IST Program for the reasons provided therein. We do not believe that the testing of these systems in accordance with ASME Section XI is required or of any benefit.

Valve Program Item 2 identified two relief requests that were both numbered A-3. In the revised IST program plan (Enclosure 2), Relief Request A-3 is that request identified as such in the March 30, 1988 submittal. Relief Request A-4 in Enclosure (2) is the previous A-3 in the July 5, 1988 submittal.

We have re-evaluated the relief request numbered AF-1 in the March 30, 1988 submittal, and decided to withdraw that request. We have included those valves on the cold shutdown list in our revised program plan.

In response to Valve Program Item 4, additional technical justification is provided in the revised program plan for relief requests SI-6 and SI-7. We also have defined the abbreviation "ITP."

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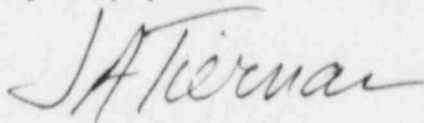
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As requested in Valve Program Item 2, the basis and alternative testing of Relief Request No. 7 was clarified to require that all data would normally be taken on a quarterly frequency.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. A. Tierman".

JAT/SRC/BSM/dim

Enclosures

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
S. A. McNeil, NRC
W. T. Russell, NRC
D. C. Trimble/V. L. Pritchett, NRC
T. Magette, DNR

ENCLOSURE (1)

RESPONSE TO NRC VALVE PROGRAM ITEM (1) AND PUMP PROGRAM ITEM (1) ON THE PROPOSED SECOND TEN-YEAR INTERVAL OF THE CALVERT CLIFFS ASME SECTION XI PUMP AND VALVE INSERVICE TEST (IST) PROGRAM

INTRODUCTION AND OVERVIEW

The NRC staff has requested that the scope of the IST program be expanded during the next 10-year interval to include the valves and pumps in the emergency diesel generator (EDG) air start and fuel oil transfer systems. In response to this request, We have reviewed the requirements for establishing the scope of the IST program as set forth in 10 CFR 50.55a, NRC Regulatory Guide 1.26 and the Calvert Cliffs Operating License. As a result of this review, we have reaffirmed that testing of these components under our IST program is neither required nor necessary. The following summarizes our findings:

Finding No. 1: The EDG Air Start and Fuel Oil Transfer Systems Are Not Required to be Tested Under the Calvert Cliffs IST Program.

Those systems and components that are required to be included within the IST program are identified by 10 CFR 50.55a as those which are classified as ASME Code Class 1, 2 or 3. The IST program scope (along with requirements relative to plant design features), is further defined in paragraph 50.55a(g)(3)(iv), which states:

"Pumps and valves which are classified as ASME Class 2 and Class 3 shall be designed and provided with access to enable the performance of inservice testing . . ." (emphasis added).

Regulatory Guide 1.26 provides a method acceptable to the NRC for identifying the quality standard and ASME code classification applicable to components containing water, steam or radioactive waste. In addition, Regulatory Guide 1.26 states clearly that:

"Other systems not covered by this guide, such as instrument and service air, diesel engine and its generators and auxiliary support systems, diesel fuel, emergency and normal ventilation, fuel handling, and radioactive waste management systems, should be designed, fabricated, erected, and tested to quality standards commensurate with the safety function to be performed." (emphasis added)

ENCLOSURE (1)

In accordance with the above regulations and regulatory guidance all Code Class 1, 2, and 3 components were identified during the plant design phase prior to the issuance of the plant operating license. This component classification formed the basis for the list of components included in the initial IST Program, as approved by the NRC on February 8, 1982. Since these systems are not classified as either Code Class 1, 2, or 3 testing under the IST Program is not required.

Finding No. 2: The EDG Air Start and Fuel Oil Transfer Systems are Already Subjected to Testing Commensurate with the Safety Function They Perform.

Both the air start and fuel oil transfer systems are subjected to testing which regularly verifies their operational readiness. This testing is conducted in accordance with the Calvert Cliffs Technical Specifications under the surveillance test program. Eight different Surveillance Test Procedures (STPs) exist in this program which require testing of the diesel generators and their auxiliary systems in various combinations on a monthly, semiannual and refueling-outage basis. Testing under this program requires a sum total of at least 36 tests per diesel generator per year, each of which confirms the operational readiness of the diesel generator and its support systems. Furthermore, the STPs require that attention be focused on the performance of the air start and fuel oil transfer systems. This is done during each test by ensuring that air receiver pressure drops by a specified amount and that fuel oil is automatically made up to maintain day tank level.

Finding No. 3: The Valves and Pumps Within the EDG Air Start and Fuel Oil Transfer Systems are Highly Reliable and are Well-Maintained.

In response to NRC Generic Letter 84-15, a diesel generator reliability program was established following the guidelines of the generic letter and Regulatory Guide 1.108. The scope of the program encompasses the entire EDG unit, consistent with the Regulatory Guide 1.108 definition; i.e.,

"A 'diesel generator' unit consists of the engine, generator, combustion air system, cooling water system up to the supply, fuel supply system, lubricating oil system, starting energy system, autostart controls, manual controls, and diesel generator breaker." (emphasis added)

Under this program, failures of the diesel generators have been trended since 1985. To date, no failure of a diesel generator unit has been attributed to the air start or fuel oil transfer systems. A separate review of all maintenance work performed on the EDG air start and fuel oil transfer systems since initial plant operation revealed no component malfunctions or deleterious conditions that would have reduced system operational readiness.

ENCLOSURE (1)

CONCLUSION

The ASME Calvert Cliffs Section XI Inservice Testing Program for pumps and valves, as approved by the NRC in 1982, is in compliance with 10 CFR 50.55a. Expansion of the IST program to include the EDG air start and fuel oil transfer systems is not required and would provide no greater assurance of operational readiness. Therefore, we decline to add these systems to the IST Program.