

October 3, 1986

DMB 016

Docket No. 50-289

Mr. Henry D. Hukill, Vice President  
and Director - TMI-1  
GPU Nuclear Corporation  
P. O. Box 480  
Middletown, Pennsylvania 17057

Dear Mr. Hukill:

SUBJECT: INSERVICE TESTING PROGRAM (SECOND TEN YEAR INTERVAL)

The Inservice Testing (IST) Program for pumps and valves is required by the provisions of 10 CFR 50.55a(g) to be revised every 120 months. The IST interval for the first 10 years of TMI-1 operation ended in September 1984 and was closed out by NRC letter to GPUN dated October 23, 1984. In accordance with NRC regulations, GPUN submitted on July 10, 1984 an updated IST program for the second 10 year interval running from September 1984 until September 1994. This submittal was intended to follow ASME Boiler and Pressure Vessel Code Section XI Division I, 1980 edition and addenda through winter 1980, except for a number of specific relief requests from code testing requirements.

After a preliminary review, the NRC staff notified GPUN by letter dated December 11, 1984 that the updated IST program should be implemented pending completion of a detailed staff review. However, the staff did reaffirm denial of many GPUN requests for relief from code requirements that were previously denied for the first 10 year interval.

In a letter dated March 19, 1985 GPUN appealed the staff's denial, on the basis of backfit considerations, and requested a further review of certain particular exemptions from ASME Code Section XI test requirements. The Director, NRR, concluded in a letter to GPUN dated August 16, 1985 that some of the staff's positions were not backfits, and for these issues GPUN could appeal the code requirements on technical grounds. But for those positions which were considered potential backfits, GPUN was not required to follow the staff position pending a completed review.

A technical meeting was held on September 4 and 5 between GPUN and NRR. Transcripts of the meeting and a follow-up EG&G trip report were issued September 16, 1985 and November 19, 1985 (respectively). The transcripts and trip report were provided to GPUN as guidance for preparing a supplement to the IST program submittal dated July 10, 1984.

On May 3, 1986, GPUN submitted a supplement to their proposed IST Program, for the second 10 year interval, which provided additional information and commitments in response to NRC guidance. The staff has subsequently reviewed

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the updated TMI-1 Pump and Valve IST Program (as supplemented) to verify compliance of proposed tests of safety related Class 1, 2 and 3 pumps and valves with the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition through Winter 1980 Addenda. In the program the licensee requested relief from certain ASME Code testing requirements for specific pumps and valves and these requests have been evaluated individually to determine whether they have significant risk implications and whether the tests, as required, are indeed impractical.

Based upon results of this review, as described in the enclosed Safety Evaluation Report (SER), the staff concludes that GPUN's IST program for the second 10 year interval is consistent with the ASME code incorporated by reference in 10 CFR 50.55a(b) as of twelve months before September 1984. The staff has also determined that requested relief from code requirements cannot be granted in all cases. Certain requests are acceptable, but others will require compliance with code requirements or alternate testing. All evaluations and conclusions documented in the SER (enclosure 2) are those of the NRC staff. It should be noted however, that pumps and valves of the fire protection system were not reviewed and, as such, not addressed by the SER.

Therefore, pursuant to 10 CFR 50.55a(g)(6)(i), relief is granted in some cases and denied in others (see enclosure 1) as described in the SER. The staff has determined granting of relief is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest considering the burden upon GPUN Corporation that could result if the requirements were imposed on TMI, Unit 1. For those relief requests denied by the staff, required testing will commence no later than the next applicable time interval, except as prescribed in Enclosure 2. For relief requests approved by the staff that allow pump or valve testing at a refueling outage interval, the maximum time period between tests shall never exceed 30 months unless otherwise required by Technical Specifications. Also, any plant modification outlined in Enclosure 2 which is required prior to fuel cycle 6 or cycle 7 shall be implemented within 30 months of this letter.

GPUN is required to revise their IST Program as defined in Enclosure 2. Any program revisions subsequent to and not in compliance with those noted in the enclosed SER are not approved. Necessary program changes, such as relief requests or the deletion of components from the IST program shall be submitted to the NRC (except as appropriate under 10 CFR 50.59), and will not be executed prior to review and approval by the NRC. Where relief is denied you may choose to appeal the decision to NRR management, or provide a new relief request with additional justification. In any case, the appeal process shall not be construed to constitute defacto exemption from implementation of code testing requirements without specific formal relief approved by the staff. This also applies to prior relief requests that were re-denied by the staff in Enclosure 2 and previous NRC letters (i.e., October 23 and November 11, 1984). GPUN should be complying with any and all code requirements that were not exempted by the staff (see SER for specific exceptions granting interim relief).

GPUN's updated second interval IST program and their Technical Specifications (TS) should not be in conflict. If a conflicting requirement is identified, GPUN will make the necessary application to the NRC to rectify the conflict as prescribed by 10 CFR 50.55a(g)(5)(ii). However, the staff is not aware of any conflicting requirements between the IST Program and TS (i.e., TS "system" test requirements and associated acceptance criteria do not appear to be in conflict with IST "component" test requirements and associated acceptance criteria).

In accordance with guidance from the CRGR on July 24, 1985, backfitting of non-Event V pressure isolation valve (PIV) leak testing at operating reactors may not be appropriate. Therefore, pending review and approval by CRGR of a PIV testing plan for operating reactors, leak testing of those valves listed in Item 10 of Appendix A of the SER (but not listed in the TS) should not be performed involuntarily. GPUN is hereby advised of the option to continue leak testing only the current TS list of PIV's until further notice.

Sincerely,

"ORIGINAL SIGNED BY  
JOHN F. STOLZ"

John Stolz, Director  
PWR Project Directorate #6  
Division of PWR Licensing-B

Enclosure:  
As stated

cc w/enclosure:  
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-2-

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Tabulation of Relief Requests Denied by the Staff

The following is a list of paragraphs in the SER (see enclosure 2) where relief was denied:

3.4.3.2	3.9.3.1	3.9.3.5
3.6.1.1	3.9.3.2	3.9.3.6
3.8.2.1	3.9.3.3	3.11.1.1
3.9.2.1	3.9.3.4	3.12.1.1
		3.12.1.2

The following is a list of paragraphs in the SER (see enclosure 2) where relief was granted only on an interim basis:

2.1.1	2.9.1	2.11.1
2.2.1	2.10.1	