Docket Nos.: 50-443

and 50-444

APPLICANT:

Public Service Company of New Hampshire

FACILITY:

Seabrook Station, Unit 1 and 2

SUBJECT:

MEETING SUMMARY

On May 13 and 14, 1986, a working meeting was held in Bethesda, Maryland with Public Service of New Hampshire, NRC, and EG&G Idaho, Inc. representatives to discuss the questions resulting from the review of the Seabrook Station pump and valve inservice testing (IST) program. Enclosed is a list of the meeting attendees, the questions that served as an agenda for the meeting, and the responses to those questions as taken from the meeting minutes. The utility representatives were given a brief introduction outlining the agenda and the methods used for the documentation of questions and responses. This was followed by detailed discussions concerning specific pumps and valves in the Seabrook IST program.

Of the 113 questions and comments discussed at this working meeting, 19 remain as open items to be resolved at a later date. These open items are identified in the enclosure. There are several additional items where the utility has agreed to make corrections or changes to their IST program as indicated in the responses to the questions.

Victor Nerses, Project Manager PWR Project Directorate #5 Division of PWR Licensing A

Fnclosure: As stated

cc: See next page

PD#51 (Newses 6/20/86



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

JUN 2 1 1986

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Enclosure: As stated

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Meeting Summary Distribution

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List

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INSERVICE TESTING PROGRAM WORKING MEETING

PLANT: Seabrook Station DATES: May 13 and 14, 1986

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James Connolly
Gary Hammer
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Rom Lipinski
Robert Martel III
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SEABROOK STATION

May 13 and 14, 1986

SEABROOK STATION PUMP AND VALVE INSERVICE TESTING PROGRAM WORKING MEETING MINUTES

May 13 and 14, 1986

A. General Questions and Comments

1. Are all valves that are Appendix J, Type C, leak tested included in the IST program and categorized A or A/C as appropriate?

Response: Yes.

- 2. Relief Requests that reference the FSAR, Technical Specifications, and other documents should be expanded to provide a brief discussion of the technical information contained in the applicable document.
- Response: The utility will include additional information in their relief requests to identify the specific operational problems that make pump or valve testing undesirable or impractical.
- 3. The NRC staff position concerning stroke time measurements of power operated valves is that those measurements must be trended in accordance with Section XI so the information can be utilized to monitor valve degradation and predict valve failure. The exception to this position is explained as follows.

Rapid-acting valves are defined as those power operated valves that stroke in 2 seconds or less. Relief from the trending requirements of Section XI (Paragraph IWV-3417(a), 1980 Edition through Winter 1981 Addenda) presents no safety concerns for these valves since variations in

 A description of the plant operating modes should be added to the IST program legend.

Response: The utility will include this information in their IST program.

Additional

Comment: The utility is working on determining limiting values of full-stroke time for power operated valves in the Seabrook IST program, but has not yet determined the values for all of these valves. The utility will provide a listing of these limiting values of full-stroke times in their program resubmittal.

B. Main Steam P&ID 202074

1. How are valves MS-PV3001, -PV3002, -PV3003, and -PV3004 fail-safe tested quarterly? Can these valves be stroke timed during fail-safe testing?

Response: The utility will fail-safe test these steam generator aimospheric dump valves during the quarterly valve exercising tests by using the remote valve positioning switches. The manual block valves may be closed prior to valve testing; this does not pose a problem for the utility.

Additional

Comment: The utility will reference in their general discussion section of the IST program the administrative procedures for performance of pump and valve inservice testing used to meet ASME Section XI requirements.

1. Should valves FW-V64 and -V70 be Category A/C in Figure 5.3? Relief Request 5 does not apply to these valves as stated in Note 4. Provide a detailed technical justification for not full-stroke exercising these two valves during each cold shutdown.

Response: These are Category C valves that are not leak rate tested. These valves will be exercised during cold shutdowns, however, this may not be a full-stroke exercise for FW-V64 since the turbine driven emergency feedwater pump may not be able to establish full flow at this time. This remains an OPEN ITEM for the utility to determine if the testing at cold shutdowns is a full-stroke exercise of FW-V64; and if it is not, it is open for them to determine a method and frequency to full-stroke exercise this valve. The utility is monitoring the pipe temperature upstream of these valves to verify that there is no major back leakage through the valves.

 The system and P&ID identification at the top of page 3 of 47, Figure 5.3, is incorrect.

Response: This is a typographical error that will be corrected.

3. Why are valves FW-V30, -V39, -V48, and -V57 fail-safe tested when the P&ID indicates that they fail "as-is"? Relief Request 1 does not apply to these valves as stated in Note 2.

Response: The identified fail-safe test will be deleted for these valves. Relief Request #4 applies to these valves.

F. Diesel Generator Cooling Water

Provide P&ID 202103 for our review.

Response: The P&ID was provided.

Additional

Comment: The emergency diesel generators are tested at 100% load monthly for 60 minutes which should verify that the check valves in this system full-stroke open. The air operated valves and the 3-way control valves in the diesel cooling water system should be evaluated to determine if they should be included in the IST program. This remains an OPEN ITEM for the utility. If these valves have a required fail-safe position, they must be included in the IST program.

G. Leak Detection

P&ID 500037-2

 Review the safety-related function of valves LD-V4 and -V5 (Location D-3) to determine if they should be included in the IST program and categorized A.

Response: These valves have been removed from the piping and the pipe has been capped and seal welded closed.

H. Containment Purge

P&ID 604131

1. Relief Request 7 does not address valves CAP-V1, -V2, -V3, and -V4 as stated in Note 8. Provide a detailed technical justification for not full-stroke exercising these valves during each cold shutdown.

Response: Valve CC-V32 will be stroke timed when it is exercised quarterly and the limiting value of full-stroke time will be identified.

Should the valve identified in Figure 5.3 as CC-V226 actually be CC-V266?

Response: Yes, this was a typographical error.

3. Should valve CC-V445 be stroke timed when it is exercised quarterly?

Response: This valve will be stroke timed quarterly and the limiting value of full-stroke time will be provided.

L. Floor Drain

P&ID 804994

What is the P&ID location of valve WLD-V200?

Response: There is no valve WLD-V200, it should be identified as WLD-V209. The valve listing table will be corrected and note 25 will be deleted for this relief valve.

What is the correct description of valve WLD-FV8331? Is this a rapid-acting valve?

Response: WLD-FV8331 is a rapid acting valve. The valve listing table will be corrected for this valve.

M. Reactor Coolant

P&IDs 805002, 805003, and 805006

1. Provide a detailed technical justification for not full-stroke exercising valves RC-V323 and RC-FV2881 during each cold shutdown. Is valve RC-FV2881 a rapid-acting valve?

N. Reactor Coolant Pressurizer

P&ID 805007

The NRC staff position concerning FORVs is that the valves be exercised each cold shutdown and if the PORVs are utilized for low-temperature overpressure protection that they be full-stroke exercised prior to initiation of system conditions for which vessel protection is needed.

Therefore, provide a more detailed technical justification for not full-stroke exercising valves RC-PCV456A and -PCV456B during each cold shutdown. Are these valves rapid-acting valves?

Response: These pressurizer PORVs will be exercised during each cold shutdown. These are rapid acting valves and will have a limiting value of full-stroke time of 2 seconds.

Note: These valves do not conform to the staff's positions on cold shutdown testing; they must be tested during each cold shutdown not necessarily to exceed once every 3 months.

O. Residual Heat Removal

P&ID 805008

1. How are valves CBS-V55 and -V56 full-stroke exercised during pump tests?

Response: These valves will not be exercised quarterly because they are not in the pump test flow path. These valves cannot be exercised during cold shutdowns because there is no flow path except into the RCS and flow cannot be established into the RCS since there is no place to put the additional inventory of water: A relief request will be provided for these valves that will provide for testing them during refueling outages.

Review the safety-related function of valves RH-V14, -V25,
 -V32, and -V70 to determine if they should be categorized A.

Response: These valves are not currently Appendix J leakrate tested to verify a containment isolation capability. These valves will not be categorized A.

Review the safety-related function of valves RH-FCV606,
 -FCV607, -FCV618, and -FCV619 to determine if they should be included in the IST program.

Response: This is an <u>OPEN ITEM</u> for the utility to determine if these valves are required to change position to take the RCS to the cold shutdown condition.

P. Safety Injection Accumulators

P&ID 805009

 The system and P&ID identification at the top of page 22 of 47, Figure 5.3, is incorrect.

Response: This is a typographical error that will be corrected.

Are valves SI-V3, -V17, -V32, and -V47 full-stroke exercised during each cold shutdown? Is power removed from the operators during cold shutdowns?

Response: These valves are closed going into cold shutdowns and are opened when starting up from cold shutdowns. Power is removed from the valve operators during cold shutdowns with the valves closed. The utility will classify these valves as passive valves and need not perform a Section XI exercising test.

 Are valves SI-V5, -V20, -V35, and -V50 leak tested during each cold shutdown? These valves have not been included in Relief Request 10. Category A, passive, valves SI-V62 and -V70 are not required to be exercised according to Paragraph IWV-3700.

Response: The exercise tests will be deleted for these passive valves.

Q. Safety Injection-High Head

P&ID 805010

- 1. How are valves CBS-V48 and -V52 full-stroke exercised during pump testing?
- Response: These valves can only be partial-stroke exercised quarterly during power operation. These valves cannot be full-stroke exercised during cold shutdowns due to low-temperature overpressurization considerations. These valves will be full-stroke exercised during refueling outages. A relief request will be provided by the utility.
- Provide a detailed technical justification for not full-stroke exercising valves RH-V50 and -V51 during each cold shutdown. Relief Request 18 does not address these valves as stated in Note 19.
- Response: These valves cannot be exercised during cold shutdowns since establishing flow through the valves could result in RHR cooling flow bypassing the reactor core. These valves are addressed in relief request #19. The relief request will be augmented to include a cold shutdown justification.
- 3. Provide a detailed technical justification for not full-stroke exercising valves RH-V52 and -V53 during each cold shutdown. Relief Request 19 does not address these valves as stated in Note 19.

- 7. Provide a detailed technical justification for not full-stroke exercising valves SI-V106 and -V110 during each cold shutdown. Relief Request 19 does not address these valves as stated in Note 19.
- Response: These valves cannot be exercised during cold shutdowns because it could result in low-temperature overpressurization of the RCS. The utility will augment relief request #18 to include the cold shutdown justification.
- Review the safety-related function of valve SI-V114 to determine if it should be categorized A.
- Response: This valve is not currently leak tested per the Appendix J requirements. This valve need not be categorized A.
- 9. Provide a detailed technical justification for not full-stroke exercising valves SI-VII8, -VI22, -VI26, and -VI30 during each cold shutdown. Relief Request 19 does not address these valves as stated in Note 19.
- Response: These valves cannot be exercised during cold shutdowns because it could result in low-temperature overpressurization of the RCS. The utility will augment relief request #18 to include the cold shutdown justification.
- Should the stroke time value be the same for valves CBS-V49 and -V53 since they appear to be identical?
- Response: The stroke times for these similar valves may be the same.
- 11. Review the safety-related function of valves SI-V138 and -V139 to determine if they should be categorized A. Has a maximum stroke time limit been determined for these valves?

Is Category A valve CS-V143 leak rate tested?

Response: This valve is not currently leak rate tested to Appendix J requirements and will be categorized B in the IST program.

3. Provide a detailed technical justification for not full-stroke exercising Category A/C valve CS-V144 quarterly or during each cold shutdown. What is the safety position of this valve? Is this valve leak rate tested?

Response: The utility will determine if this valve performs a safety related function in the open position to pass flow for auxiliary pressurizer spray. This valve is not currently leak tested to the Appendix J requirements and will be recategorized C. This is an OPEN ITEM for the utility.

 Provide a detailed technical justification for not full-stroke exercising valves CS-V149 and -V150 quarterly.

Response: The utility will full-stroke exercise these valves during cold shuidowns and refueling outages. Relief Request #21 will be modified to expand the technical justification for not exercising these valves quarterly during power operation which will include loss of pressurizer level control and a possible plant trip.

5. In reference to Relief Request 22, are the reactor coolant pumps ever secured at any time other than refueling outages?

Response: The reactor coolant pumps can be secured during cold shutdowns, therefore, valves CS-V167 and V168 will be exercised during cold shutdowns when the reactor coolant pumps are secured. Relief request #22 will be revised to conform to this position.

- Response: The utility feels that these valves are passive and need not be included in the IST program. This remains an <u>OPEN ITEM</u> for the NRC to determine if these valves perform an active safety function.
- 10. Provide a detailed technical justification for not full-stroke exercising valves CBS-V58 and -V60 quarterly and during cold shutdowns.
- Response: The utility will provide a relief request for these valves and will include in their justification for not exercising quarterly the basis that testing would inject higher concentrations of boric acid into the RCS which could result in a plant shutdown. The basis for not exercising during cold shutdowns will be the low-temperature overpressurization concerns. The correct valve listing table entries will be made for these valves.
- 11. How is valve CS-V192 full-stroke exercised during pump testing? What is the safety-related position of this valve?
- Response: This valve does not perform a safety related function and need not be included in the IST program.
- 12. Is the required design basis accident flow rate achieved during pump testing to demonstrate a full-stroke exercise of valves CS-V200 and -V209?
- Response: The quarterly testing results in a partial-stroke exercise of these valves. They cannot be full-stroke exercised during cold shutdowns due to low-temperature overpressurization concerns. These valves will be full-stroke exercised during refueling outages. A relief request will be provided for these valves.

Response: These valves will be exercised during cold shutdowns and refueling outages when the cooling loads are low enough to allow securing one train of component cooling. A relief request will be provided for these valves.

2. Provide a detailed technical justification for not full-stroke exercising valves CC-V447 and -V448 at least at a refueling outage frequency. Are these modulating valves whose stroke time need not be measured? Relief Request 29 does not address these valves as stated in Note 26.

Response: These valves will be exercised during cold shutdowns and refueling outages when the cooling water to non-essential loads can be isolated. A relief request will be provided for these valves. The limiting value of full-stroke time will be provided for these valves.

T. Component Cooling

P&ID 805018

1. Provide a detailed technical justification for not full-stroke exercising valves CC-TV2171-1 and -TV2171-2 at least at a refueling outage frequency. These valves are incorrectly identified on page 29 of 47, Figure 5.3. Relief Request 29 does not address these valves as stated in Note 26.

Response: These valves will be exercised during cold shutdowns and refueling outages when the cooling loads are low enough to allow securing one train of component cooling. A relief request will be provided for these valves.

V. Nitrogen Gas P&ID 805020

1. Has a minimum value of limiting stroke time been assigned to valves NG-V13, -V14, -FV4609, and -FV4610? Are these passive valves?

Response: These valves will be classified as passive valves that need not be exercised in the IST program. The limiting value of full-stroke time need not be provided for these passive valves.

W. Reactor Makeup Water

P&ID 805021

Provide P&ID 805021 for our review.

Response: The P&ID was reviewed and will be provided with the utilities resubmittal.

Should valve RMW-V29 be identified as passive?

Response: This valve is a passive valve and it need not be exercised by the IST program.

 Has a maximum value of limiting stroke time been assigned to valve RMW-V30?

Response: Valve RMW-V30 is a category A-passive valve that need not be exercised by the IST program.

X. Combustible Gas Control

P&ID 805022

 Has a maximum value of limiting stroke time been assigned to valves CGC-14 and -28?

Response: These are Category A-passive valves. The limiting values of full-stroke time for these passive valves need not be assigned.

The valve identified as CBS-V6 on page 34 of 47, Figure 5.3, is incorrect and should be CBS-V7. The valve identified as CBS-V7 should be CBS-V8 and the valve identified as CBS-V8 should be CBS-V9.

Response: This is a typographical error that will be corrected.

How is valve CBS-V7 full-stroke exercised?

Response: The utility is establishing flow through this valve during pump testing. The test flow of ~2000 gpm is below the ~3000 gpm design accident flow. This is an OPEN ITEM for the utility to determine a method and frequency for full-stroke exercising these check valves.

 Review the safety-related function of valve CBS-V8 to determine if it should be categorized A.

Response: This valve is not currently leak tested to the Appendix J requirements. This valve need not be categorized A.

 Review the safety-related function of valve CBS-VII to determine if it should be categorized A.

Response: This valve is not currently leak tested to the Appendix J requirements. This valve need not be categorized A.

6. Review the safety-related function of valve CBS-V12 to determine if it should be categorized A/C instead of B. How is this valve full-stroke exercised during refueling outages? Provide a detailed technical justification for not full-stroke exercising this valve each cold shutdown.

10. Should valves CBS-V31, -V32, and -V33 be stroke timed when tested?

Response: These valves will have their stroke times measured during valve exercising.

Additional

Comment: Valves CBS-V9, V15, V25, and V26 will be disassembled and inspected during refueling outages. They will be disassembled on a sampling basis with two groups made up of valves CBS-V9 and V15 and valves CBS-V25 and V26. Relief request #28 will be expanded to discuss sample disassembly and inspection for these valves.

Z. Sample Service

P&ID 805025

What is the normal position of valve RC-FV2836?

Response: The normal position of this valve is closed.

 It is unnecessary to full-stroke exercise relief valve RC-V312 quarterly.

Response: This is a typographical error and the valve need not be exercised. The relief valves are passive valves.

AA. Primary Component Cooling

P&ID 805028

1. Provide a detailed technical justification for not full-stroke exercising valves CC-V175, -V176, -V256, and -V257 quarterly in accordance with Section XI. Relief Request 22 does not address these valves as stated in Note 22 and it also appears that Note 22 does not apply.

DD. Service Water P&ID 805033

 Review the safety-related function of valves SW-V63 and -V64 to determine if they should be included in the IST program and tested in accordance with the requirements of Section XI.

Response: These valves do not perform a safety related function and need not be included in the IST program.

EE. Service Air

P&ID 202108 and 804989

Review the safety-related function of valves SA-V229
 and -V1042 to determine if they should be included in the IST program and categorized A.

Response: These valves are currently leakrate tested per Appendix J and will be included in the IST program as category A-passive valves.

FF. Containment Air Handling

P&ID 604131

 Valve CAH-V12 should be Category A/C. Note 1 does not apply to this check valve.

Response: This valve will be categorized A/C. This is an OPEN ITEM for the utility to determine if valves CAH-FV6572, FV6573, and FV6574 are active or passive valves. Note 1 will be deleted for valve CAH-V12 in the valve listing table.

2. PUMP TESTING PROGRAM

1. Provide the documentation that demonstrates that all safety-related pumps are being tested quarterly in accordance with Section XI. This information should be included in the IST program and can be in the form of a table similar to the valve test tables identifying the pump, tests performed, and any applicable relief requests.

Response: A table listing the pump testing performed at Seabrook
Station was provided. This table will be included in the
IST program resubmittal.

In reference to Relief Request 31, does using the computer readout when measuring pump flow provide repeatable test data?

Response: The utility will provide a listing of the instrument accuracies as an attachment to the IST resubmittal. The computer readout meets the requirements for repeatable test data.

3. Are both flow and differential pressure measured when testing the service water pumps?

Response: Yes, both pump flow and differential pressure will be measured for these pumps. The relief request for not varying pump flow in the fixed flow system will be deleted.

Additional

Comment: It is an <u>OPEN ITEM</u> for the utility to determine which type of pump vibration measurements will be taken at Seabrook. If velocity measurements are used, it is open for the utility to determine the alert and required action ranges.