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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project Electric Generating Station
Unit 1
Docket No. STN 50-498
Pump and Valve Inservice Test Plan, Revision 2

On December 14, 1987, a conference call was held between personnel from HL&P, the NRC, and their contractor, EG&G, to discuss NRC comments on Revision 2 of the STPEGS Unit 1 Pump and Valve Inservice Test (IST) Plan. As a result of this conference, all comments were resolved as follows:

1. NRC Comment:

   Why has the reference to the bi-annual verification of remote valve position indication accuracy been deleted from the IST program, Revision 2, for valves FCV-0851, FCV-0852, FCV-0853, HCV-0864, HCV-865, and HCV-866?

   HL&P Response:

   Valves FCV-0851, FCV-0852, FCV-0853, HCV-0864, HCV-0865 and HCV-0866 in the Residual Heat Removal System will have the reference to remote position indication verification added into the IST Plan.

2. NRC Comment:

   Valves PV-6854, PV-6864, PV-6874, PV-6904, PV-6905, and PV-6906 have been added to the IST program. Will these valves be fail-safe tested and have their remote position indication verified in accordance with the Code requirements?

   HL&P Response:

   Valves PV-6854, PV-6864, PV-6874, PV-6904, PV-6905 and PV-6906 in the Essential Cooling Water System which were added to the IST Plan are fail-safe tested in their respective test procedure. Also, remote position indication verification will be incorporated for these valves.

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3. NRC Comment:

Why have valves FV-4450A and 4451A been deleted from Revision 2 of the IST program?

HL&P Response:

Power to valves FV-4450A and FV-4451A has been removed; they no longer receive an ESF actuation signal and do not serve a containment isolation function. Therefore, these valves have been deleted from the IST Plan.

4. NRC Comment:

The relief request reference for high head safety injection to hot leg check valves XSI-0010A, 0010B, and 0010C has been changed from RR-36 to RR-32. Relief request 32 (cold shutdown justification) has been revised to state that the LHSI pumps cannot overcome RCS pressure to allow flow through these check valves during power operations. How are valves XSI-0010A, 0010B, and 0010C full-stroke exercised during cold shutdowns?

HL&P Response:

The flow identified by the safety analysis as being required for hot leg recirculation can be demonstrated during cold shutdown using the RHR pump. Therefore, XSI-0010A/B/C will be full-stroke exercised in cold shutdown by utilizing the RHR pump to provide a short duration flow to the hot leg. This is also the method used to full-stroke exercise XRH-0065A/B/C and XRH-0020A/B/C. For this reason, the relief request was changed from RR-36 (partial-stroke exercising during cold shutdown and full-stroke exercising during refueling) to RR-32 (full-stroke exercising during cold shutdown). Relief request RR-36 is no longer applicable to any valves in the IST Plan and will be deleted.

5. NRC Comment:

What flow path is utilized to partial-stroke exercise the XSI-0030A and 0005A valves during quarterly pump testing?

HL&P Response:

The SIS test lines downstream of XSI-0030A/B/C and XSI-0005A/B/C, which return flow to the RWST, will be utilized as flowpaths to partial stroke exercise these valves. Partial flow will be indicated on FI-0920A.

6. NRC Request:

The NRC requested that vibration velocity be used in lieu of vibration displacement as the alternate testing for bearing temperature.

HL&P Response:

Relief request RR-8 alternate testing requirements will be revised to state that vibration velocity will be measured quarterly in lieu of bearing temperature measurement for all pumps except the CVCS Centrifugal Charging Pumps. Due to ALARA considerations vibration for the changing pumps will be measured using remote instrumentation which provides vibration displacement only.

In addition to the conference call on December 14, 1987, HL&P held a conference call with the NRC on December 3, 1987. The subject of this call was an HL&P request to withdraw relief request RR-47, identified in Revision 2 of the STPEGS Unit 1 Pump and Valve Inservice Test Plan.

The basis for this relief request was that full stroke exercising of the feedwater isolation bypass valve was not practical during power operation. This valve controls flow through the bypass line. Full stroke testing of the bypass valve would require the use of jumpers to defeat the valve closing logic during power operations as HL&P anticipates high flow conditions to exist in the bypass line.

However, data concerning flow through this bypass line during power operation is not yet available to justify this relief request. HL&P therefore requests that this relief request be withdrawn until data is obtained to justify the relief. HL&P understands that relief from this testing requirement will be granted should high flow conditions prevent full exercising of the bypass valve during power operations.

A revision to the IST Plan incorporating these revisions will be sent to you by January 15, 1988.

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