



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 29, 1989

Docket Nos. 50-325
and 50-324

Mr. Lynn W. Eury
Executive Vice President
Power Supply
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Eury:

SUBJECT: ASME CODE RELIEF REQUEST FOR DIESEL GENERATOR STARTING AIR
CHECK VALVES - BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2,
(TAC NOS. 71090 AND 71091)

On November 24, 1987, pursuant to 10 CFR 50.55a(g)(4), you submitted a revised In-Service Testing (IST) Program which included relief request number VR-26 for the diesel generator starting air check valves, and program remark number V-08 which included both the diesel generator starting air check valves and the diesel generator starting air (jet assist) valves. The reason for your relief requests is as follow:

"The testing of these valves must be in conformance with ASME Section XI, subsection IWV 3520 code requirements. This subsection requires confirmation that each check valve disk is on its seat, by visual observation, by electrical signal initiated by a position indicating device, by observation of appropriate pressure indications in the system, or by other positive means. Literal compliance with these requirements is impractical for the subject valves because there are no external or remote means to verify valve position during system operation, nor is there an external means to manually cycle the valves."

On November 2, 1988, you submitted a letter stating that you have completed a review of periodic test procedures for these check valves and have determined that relief request number VR-26 and program remark number V-08 need to be amended. You also submitted amended VR-26 and program remark V-08, and new relief request VR-31 with the letter.

The primary purpose of the revision to VR-26 and the new relief request VR-31 is that the diesel, of which these valves are a part, must be shut down and inspected at least every 18 months in accordance with Technical Specification 4.8.1.1.2.d.1. Plant procedures are being revised to take credit for disassembly of these valves during these shutdowns. This represents a more conservative approach than identified in the previous program submittal in that 100% of the subject valves will be examined every 18 months versus the sampling required by the previous program.

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The change in V-08 will allow the sample disassembly valves to be examined over a 2 year interval versus the current requirement of each refueling outage. This will provide more flexibility to the plant in that some of the valve disassemblies may be performed during system outages versus exclusively during unit refueling outages as currently required by program note V-08.

In accordance with the requirements of 10 CFR 50.55(a)g, the staff has performed a review of your requests and has determined that certain ASME Code requirements are impractical, and therefore; has found that your proposed alternate testing method for meeting the Code and the current Brunswick TS, by disassembling and manually cycling these valves every 18 months, to be acceptable. Therefore, relief requests VR-26 and VR-31 are granted. The proposed change to the Program Remark V-08 is granted on an interim basis until a more detailed evaluation of your proposal and the review of your IST program are evaluated. The staff has determined, pursuant to 10 CFR 50.55(g)(6)(i), that granting of relief is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest. In making this determination, the staff has given due consideration to the burden that could result if those requirements were imposed on the facility.

Sincerely,

Original Signed By:

Ngoc B. Le, Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. L. W. Eury
Carolina Power & Light Company

Brunswick Steam Electric Plant
Units 1 and 2

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