Florida Power
CORPORATION

May 24, 1990
3F0590-01

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Pump and Valve Program

Dear Sir:

Florida Power Corporation (FPC) submitted Revision 9 of the Pump and Valve Program on October 31, 1989, in response to Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs". Following the provisions of the generic letter, FPC has determined it is necessary to perform alternate testing for the Reactor Building Spray suction check valves BSV-1 and BSV-8. This alternate examination differs from the requirements of ASME Section XI, Subsection IWV-3522, which requires closure verification during normal plant operation and during cold shutdown. The ASME requirements have been determined to be impractical based on the following:

1. Building Spray Pumps 1A & 1B suction check valves, BSV-1 and BSV-8, are required to prevent backflow of Sodium Hydroxide (NaOH) into the Decay Heat Pump suction headers. The performance of check valve closure verification requires the operation of a Building Spray Pump in one train in order to pressurize the other train through the discharge crosstie connection. During this operation, the manually operated non-safety related recirculation line to the BWST is open to prevent deadheading of the operating pump. This configuration will keep both the "A" and "B" Building Spray System trains open to the non-safety related recirculation line and could prevent adequate flow from reaching the spray nozzles if the Building Spray System actuated.

2. Performance of this test during cold shutdown conditions would involve the same operation as described in item 1 above. The Building Spray Pump would take suction from the same supply header as the Decay Heat Pump in service for Reactor Coolant System (RCS) cooling. This configuration would pump RCS water into both Building Spray Pump lines and into the BWST. This is undesirable because it will increase the dose rate in the piping and the BWST.

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Building Spray Valves, BSV-1 and BSV-8, are scheduled to be disassembled and inspected during Refuel 7. At least one of these valves will be disassembled and inspected during each refueling outage. If the inspected valve is found to be degraded to the extent it can not perform its function, then the other valve will be disassembled and inspected as described below.

The inspection will assure that the valve disk has freedom of movement and is capable of a full stroke. Additionally, the general condition of the valve internals will be checked for structural degradation including the presence of any loose parts, debris and abnormal or excessive corrosion products, wear and erosion. This inspection includes verification of seating contact.

The maintenance history for these valves has been compiled and reviewed, and it has been determined that the procedures used for inspection adequately monitor for any recurring problems. The results of all inspections resulting from this alternative test method will become part of the history file for these valves, and any discrepancies noted during the preceding inspection will be monitored during the next inspection.

There is no instrumentation used for this alternative test; therefore, maintenance and calibration data is not applicable. Additionally, these valves are currently full-stroke exercised once every three (3) months during normal plant operation.

This letter is provided voluntarily to inform the NRC of FPC's intentions to utilize an alternate inspection method, as described herein. FPC is currently following industry developments on check valve non-intrusive testing and will evaluate the feasibility for inclusion in the Pump and Valve Program. Should there be any questions, please contact Loretta Cecilia at (904) 563-4546.

Sincerely,

P.M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB:LVC:wla

xc: Regional Administrator, Region II
Senior Resident Inspector