NRC Temporary Instruction Feedback

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June 2, 2010

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General Comments

- Acceptability of "as found" gas voids should be based on operability approach (engineering judgment) versus design confirmation [1.2].
  - Engineering judgment should always be an acceptable method for determining Operability
- What information is the NRC waiting for to determine the time to clear gas vs flow rate (dynamic venting)? [1.4, #2]
- Table of allowable void fractions contains data that was not originally contained within the NEI APC letter 09-20. What is the basis for these values? [1.4]
  - Single stage pump void acceptance criteria

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General Comments

- What new information on NPSH has come to light?
- The TI appears to use an un-reviewed NRC approach for assessing void size versus the industry method in APC 09-20. This seems to conflict with the understanding of general agreement discussed during the January meeting – "single criteria" [1.4, last paragraph]

General Comments

- What activities are appropriate for developing guidance on vortexing? [1.5]
- What is the basis for the prescriptive time requirements for surveillances and follow up testing? [1.9]
  - Confusion with tech spec terminology
- Failure of a relief valve to reseat does not necessarily result in system inoperability [1.10]

Requested Actions

- Near term revision to TI to incorporate acceptable comments prior to completion of the revision to NEI 09-10
- TI should reference NEI 09-10 for void criteria upon its endorsement in lieu of separate void criteria