

NRCREP Resource

From: Benjamin Oguejiofor [BOguejiofor@ameren.com]
Sent: Monday, December 13, 2010 4:26 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Benjamin Oguejiofor (BOguejiofor@ameren.com) on Monday, December 13, 2010 at 16:26:25

*8/12/2010
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Document_Title: Draft NUREG-1946

Comments: The below mentioned sections of NUREG 1842 Rev.1 were found missing from draft NUREG 1946. The responder highly recommends these sections be included in NUREG 1946:

1. Section 5.3: Allowable variance from reference points and fixed resistance systems.
„« The responder highly recommends this section that discusses variance from fixed reference values be included in NUREG 1946. The recommendation as documented and endorsed by the commission will eliminate relief requests in the future from utilities using this guidelines provided by NUREG 1842 Rev. 1. This item was equally considered a high priority to be included in NUREG 1946 during the just concluded IST owner's group meeting in Florida.
2. Section 5.2.2: Reference curves
„« This section discusses the establishment of reference curves when the establishment of specific reference values may be impractical for a centrifugal or vertical line shaft pump. The responder recommends this alternative be included in NUREG 1946.
3. Section 4.1.2: Exercising check valves with flow and non-intrusive techniques
„« The guidance provided in this section elaborates further on code requirements for non-intrusive check valve testing. Including this section in NUREG 1946 would provide a great resource for non-intrusive check valve testing.
4. Section 3.3.1: Deferring valve testing to each cold shutdown or refueling outage
„« The guidance provided in this section will be very helpful especially for a new IST Engineer preparing a 10 year update. It is highly recommended this section be included in NUREG 1946.
5. Section 3.5: pre-conditioning of pumps and valves
„« This section provides good guidance on pre-conditioning. Currently, a lot of issues are going on in the industry today related to pre-conditioning. Providing this guidance in NUREG 1946 will be a great reference tool for the IST Engineer and other Engineers involved with Tech Spec associated testing. This item was equally considered a high priority to be included in NUREG 1946 during the just concluded IST owner's group meeting in Florida

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*SONSI Review complete
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