

**NRCREP Resource**

**From:** Edward Cavey [caveye@dteenergy.com]  
**Sent:** Wednesday, January 05, 2011 3:00 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

Edward Cavey ([caveye@dteenergy.com](mailto:caveye@dteenergy.com)) on Wednesday, January 05, 2011 at 15:00:16

Document Title: NUREG-1946 - Inservice Testing of Pumps and Valves, and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants

Comments: On behalf of the Inservice Testing Owners Group (ISTOG) I offer the following comments: Industry IST engineers have provided feedback to ISTOG on a number of concerns with the draft NUREG-1946. These concerns stem mainly from plans to supersede NUREG-1482 with this new document. There is valuable and relevant ASME OM Code implementation guidance in NUREG-1482 that is not included in NUREG-1946. A partial list of these guidance items is as follows:

- NUREG 1482 Section / Element description
- 5.3 Variance from fixed reference values
- 4.4.2 PMT following packing adjustments / backseating
- 5.2.2 Use of pump reference curves
- 3.1.3 IST exam scheduling, including discussion on grace
- 3.4 Skid-mounted components
- 5.5.3 Use of tank level change instead of suction pressure measurement
- 5.1 Alternatives to Comprehensive Pump Testing requirements
- 3.1.1.2 Testing during power ascension
- 4.4.4 Pressure Isolation Valve (PIV) testing
- 3.1.1 Guidance on preparing acceptable CSJ / ROJ deferrals
- 5.5.2 Use of tank level change instead of flow measurement
- 4.1.2 Check valve non-intrusive testing
- 4.2.1 Limiting stroke time values for POVs

8/12/2010  
BFR 48997  
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It is also a concern that draft NUREG-1946 does not include any substantive discussion of preconditioning. ISTOG is currently performing a thorough review of all of these items with the intent to submit more specific feedback / recommendations for inclusion in NUREG-1946. It is unlikely that all of these feedback items can be completed within the existing public review period ending 1/20/2011. It is our hope that the NRC will extend the review period to at least 3/20/2011 to accomodate this effort.

Thank you,  
Edward Cavey  
Chairman - IST Owners Group

organization: Inservice Testing Owners Group

address1: EF2 210AIB

address2: 6400 N. Dixie Hwy

city: Newport

state: MI

SUNSI Review Complete  
Template = ADM-D13

F-RIDS = ADM-D3  
Add = E. Bedi (9562)

zip: 48166

country: U.S.

phone: 734-586-1633

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