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Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment on draft NUREG-1482, "Guidelines for Inservice Testing at NPP." Supports discussions at public meeting on 940202-03.

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'94 JAN 21 P3:15

January 14, 1994

PG&E Letter No. DCL-94-010

Chief, Rules and Directives Review Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Comments on Draft NUREG-1482 (Proposed Supplement 1 to Generic Letter 89-04)

Gentlemen:

In Federal Register Notice dated December 16, 1993, the NRC requested comments on draft NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants." When issued, the NRC proposes to forward the NUREG as Supplement 1 to Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." Enclosed are PG&E's comments on the draft NUREG to support discussions at the public meeting scheduled on February 2-3, 1994.

Sincerely,

Gregory M. Rueger

cc: Mary H. Miller
Kenneth E. Perkins
Sheri R. Peterson
Diablo Distribution
Document Control Desk

Enclosure

6338S/JHA/469

ENCLOSURE

COMMENTS ON DRAFT NUREG-1482, GUIDELINES FOR INSERVICE TESTING AT NUCLEAR POWER PLANTS

1. Code Cases, RG 1.147

Pages 2-2 and 2-3 discuss RG 1.147 and lists four Code Cases. Are these Code Cases listed because they are the only ones that apply to IST? Please clarify the NUREG. Also, please add a discussion indicating that Code Cases that have been incorporated into a licensee's Program but are no longer listed in RG 1.147 (because they have been incorporated into ASME Codes) may continue to be implemented by licensees.

2. Scope of IST Programs

Page 2-3 states that "both Section XI and 10 CFR 50.55a(f) specify that the IST program include pumps and valves in Code Classes 1, 2, and 3 required to perform a specific safety function.... In future rulemaking, the NRC will consider expanding the scope to include all safety-related pumps and valves." We maintain that the scope of 10 CFR 50.55a should not be changed from its current scope because it would result in an increase in scope without a compensating increase in the level of safety. For example, the rulemaking would require testing of pumps and valves that were not originally designed to accommodate testing in accordance with Section XI/OM.

3. Piping and Instrument Diagrams (P&IDs)

Page 2-6 states that "the staff recommends that P&IDs or system drawings be included in the program submittal to assist in identifying the pumps and valves included in the program." We believe that this recommendation places an unnecessary burden on the licensee to supply drawings in the IST Program Plan. P&IDs are available in updated FSAR submittals. In addition, Section XI boundary drawings are available in the Inservice Inspection (ISI) Program Plan. Redundant drawings in the IST Program Plan are not justified. However, if relief requests are submitted, we agree that providing pertinent drawings to the NRC to assist their review is warranted when NRC concurrence is required.

4. Use of Subsequent Code Editions and Addenda

Pages 1-1, 2-1, 3-11 all have sentences which state that prior NRC approval is needed for licensees to use later Code editions and addenda than those incorporated by reference in 10 CFR 50.55a(b). This is consistent with 10 CFR 50.55a(f)(4)(iv). However, page 3-1 discusses an example where "relief is not required" when implementing portions of OM-10 (i.e., a later Code). Please clarify how licensees can use later Codes without NRC approval.

5. 120-Month Updates for Multiple Units

Section 3.3.2, page 3-11, states that "if a licensee elects to use the same Code edition for multiple units, the staff recommends that an alternative to or exemption from the regulation be requested to place the multiple units on a concurrent interval for IST." Can guidance be added for licensees who wish to use the same Code edition for multiple units, but do not wish to place the units on concurrent intervals?

6. Extension of Intervals

Page 3-11 provides an example of a licensee extending an interval from December 14, 1994, to September 16, 1995, in accordance with the Code. Since the interval was increased by 9 months, we assume that the subsequent interval must start between September 16, 2004 (i.e., 9/16/2005 minus 12 months) and December 16, 2005 (i.e., 9/16/2005 plus 3 months). Is this correct? Could this example be added to the NUREG?

7. Preparing Pump Curves

Page 5-3, item (3), requires that licensees must "construct each curve with a minimum of five points." We disagree with the requirement for five points because it does not differentiate between the amount of pump curve used. For example, five points would be appropriate for a curve encompassing the entire pump operating range, but three points are sufficient for a curve encompassing five percent of the pump operating range. What is the basis for five points?

8. Tolerances from Reference Points

Page 5-5 states that "in no case is a total tolerance of greater than +/- 2 percent of the reference value allowed without relief." We disagree with establishing a +/- 2 percent allowable variance. Licensees should be able to establish and justify a range for a reference value. For example, a pump that operates on recirculation by an automatic control valve may see flow variations from 500 to 1500 gpm. However, for this pump, this may represent the flat part of the pump curve. Monitoring at any value higher than 500 gpm and within the range would provide improved ability to monitor for degradation.

9. Alternatives to Code Requirements

In a discussion of 10 CFR 50.55a(3)(i) and (ii), page 6-4 states that when "... an alternate method is requested, approval from the NRC is required before implementing the alternate method of testing..." But IWA-2240 implies that prior approval from the NRC is not required as long as the Authorized Nuclear Inspector concurs. IWA-2240 states that "Alternative examination methods, a combination of methods, or newly developed techniques may be substituted for the methods specified in this Division, provided the Inspector is satisfied that the results are demonstrated to be equivalent or superior to those of the specified method." Please clarify when IWA-2240 may be applied with respect to alternative testing and exams.