

Westinghouse  
Electric Corporation

Water Reactor  
Divisions

PWR Systems Division

Box 355  
Pittsburgh Pennsylvania 15230

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PROPOSED RULE

*SC*  
*704-5*  
*Brown*  
*PR-Misc Notice*  
*Reg. Guide*

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
1717 H. Street  
Washington, D.C. 20555

Attention: Docketing and Service Branch



Dear Sir:

In response to the invitation which appeared in the Federal Register, Westinghouse Nuclear Energy Systems would like to take this opportunity to submit written comments and suggestions pertinent to the draft Regulatory Guide and Value-Impact Assessment "Functional Specification for Safety-Related Valve Assemblies in Nuclear Power Plants" which endorses ANSI N278.1-1975.

Westinghouse has reviewed this Regulatory Guide, including the definition of active valves, and agrees with the need to clearly identify active valve functional requirements. It should be recognized that such functional requirements are presently being specified in the design process in conjunction with implementation of the overall NSSS design and valve operability programs. However, Westinghouse fails to recognize the need for a Regulatory Guide which primarily identifies a format for specifying active valve functional requirements. Westinghouse also has serious concerns regarding the definition of active valves and the format in which this definition is presented in this Regulatory Guide. Therefore, Westinghouse recommends the NRC withdraw this Regulatory Guide as further justified by the following comments:

General Comments

1. As identified in Section B of this Regulatory Guide, the "Staff believes that (1) there is a need for a set of comprehensive requirements to provide the detailed documentation that serves as the basis for construction, assurance of operability, inservice testing, and applicability of and relationship among the separate standards and (2) there should be both technical compatibility and consistent requirements for similar issues among the documents that comprise the set of comprehensive requirements". Westinghouse concurs with these needs and has implemented them as described in Safety Analysis Reports, the Westinghouse Quality Assurance Program, internal procedures, and functional design documents. This documentation, integrated in the overall design process, provides an

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acceptable means of implementing and satisfying these needs. Therefore, it is not considered appropriate to issue a Regulatory Guide merely to require consolidation of a set of requirements into one document when such requirements are already accountable in the design process.

2. This Regulatory Guide (Position c.1.b) focuses on the need to provide a valve manufacturer with all the functional (system and operability) requirements as well as hardware design and manufacturing (ASME Code) requirements. In many cases it is not considered necessary to include all functional requirements in a specification provided to a valve manufacturer. Many of these functional requirements are included in the systems design which dictates the type of valve required for the system application. Inclusion of all such functional requirements in a valve manufacturing specification is unnecessary and would needlessly burden the valve manufacturer with design information not required to manufacture the valves.
3. This Regulatory Guide redefines active components in the Discussion section. Specifically, the definition of active valves is expanded to include all safety and relief valves. Westinghouse considers this definition to be inappropriate because all safety and relief valves are not relied upon to perform a safety function (as well as a reactor shutdown function) during the transients or events considered in the respective operating condition categories. Therefore, it is not considered necessary to include all safety and relief valves as active.

Westinghouse also considers it inappropriate to expand regulatory requirements in the Discussion section of a Regulatory Guide. Such requirements should be included in the Regulatory Position of a Regulatory Guide. Additionally, the impact of this expanded requirement is omitted from the Value/Impact Statement (see comment on Value/Impact Statement).

#### Specific Comments

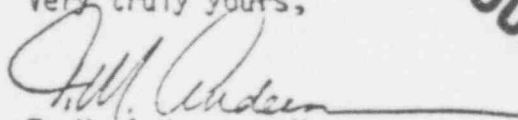
1. Page 6, Paragraph 1.a - It is not clear if this paragraph refers to manually operated valves or valves which are manually actuated remotely. Also, it is difficult to understand if this requirement is really necessary. For example, how does one actuate a valve manually if the system has already failed?
2. Page 11, (4) - As written, this paragraph could be misinterpreted to associate frequency with DC power. To preclude unforeseen confusion, it should be reworded as follows:  
  
"Electrical power available shall be identified as AC (frequency, single phase and/or three phase) and/or DC with high and low voltage limits specified."
3. This Regulatory Guide should modify the definition of 'frequent use' in paragraph 3.1.1 of ANSI N278.1-1975. Five hundred cycles is inappropriate for a forty year plant life when considering that frequently operated valves cycle up to 20,000 times during the forty year plant life.

Value/Impact Statement Comments

1. The background statement identifies the need to include valve operability requirements in specifications to valve manufacturers. With the requirements in Regulatory Guide 1.70 for valve operability such requirements have been implemented and included in manufacturing specifications where applicable. Therefore, the need for an additional Regulatory Guide to reiterate such requirements may have been necessary in 1972 but is not necessary in light of 1979 licensing requirements.
2. Westinghouse believes the NRC should provide justification to support the value of requiring "a uniform basis and approach for specifying the functional requirements and operability characteristics" when such requirements and characteristics are already accountable in the design process.
3. The impact statement indicates that requirements for valve operability exist in other Regulatory Guides and are being implemented. Westinghouse concurs with this statement and, therefore, does not understand the need for the Regulatory Guide.
4. The Impact statement does not recognize the ramifications of this guide on the design process. The generation of a specification merely to consolidate requirements would result in changes to internal design control procedures, changes in the overall design process, and generation of an additional design document and associated quality assurance documentation. Based upon the number of valves in a nuclear power plant, this would impose considerable manpower and record keeping costs with little, if any, benefit to the safety of the plant.
5. The impact on valve procurement costs would be significant even though no new requirements would be imposed. The valve manufacturer would be subjected to a specification that contained requirements which have no direct impact on manufacturing the valve. This would lead the valve manufacturer to inflate costs based upon uncertainty and a lack of understanding of the total set of functional requirements for the valve.
6. The Discussion section of this Regulatory Guide expands the definition of active valves to include safety and relief valves. This expanded definition could have a significant impact on system, hardware, and procurement requirements. The Value/Impact Statement does not address this expanded aspect of the proposed Regulatory Guide.

Should the Commission desire, Westinghouse would be pleased to further discuss the comments provided on this subject.

Very truly yours,



T. M. Anderson, Manager  
Nuclear Safety Department

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