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Secretary of the Commission
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

ATTENTION: Docketing and Service Branch

Gentlemen:

COMMENTS ON DRAFT REGULATORY GUIDE
TASK SC 704-S

Wisconsin Electric Power Company has reviewed the NRC Draft Regulatory Guide, "Functional Specifications For Safety Related Valve Assemblies In Nuclear Power Plants". Our comments are provided as an attachment to this letter.

We appreciate the opportunity to review and comment on these draft Guides and trust our comments will be given every consideration in the final revision of the Guide.

Very truly yours,

Sol Burstein
Executive Vice President

Sol Burstein

Enclosure

Acknowledged by card 5/22

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COMMENTS ON DRAFT NRC REG. GUIDE
"FUNCTIONAL SPECIFICATION FOR SAFETY-RELATED VALVE ASSEMBLIES IN NUCLEAR POWER PLANTS"

Task SC 704-5, Div. 1, February 1979
By Wisconsin Electric Power Company

1. Section B, 2nd paragraph, page 3

The Guide states that "... it is apparent that it (the functional specification) would be useful for any safety-related Quality Group A, B, C or D valve assembly". However, this is not at all apparent. For example, Reg. Guide 1.26 classifies spent fuel pool cooling systems as Quality Group C and thus, presently requires ASME Section III, Class 3 design and fabrication efforts in building such a system. In addition, a spent fuel pool possesses a characteristic generally referred to as thermal inertia. The thermal inertia provides time for remedial action, even in the unlikely event of a failure of an active component such as a valve.

The success of a program to require functional specifications for safety-related active valves would be greatly enhanced if it was initially restricted to only those components for which it is truly required. The program should initially be restricted to only Quality Groups A and B. By the above example, functional specifications are not required for Quality Group C and by inference neither for Quality Group D.

2. Section B, 5th paragraph, definition of "Active Pumps and Valves"

The terminology of "... a postulated event" is unclear and needs to be better defined. As a minimum, the words should be changed to "... the consequences of reasonably postulated events included in the NSSS safety analysis."

3. Section C.1.a, page 6

Safety-related active valves are not manually operated; see the definition included on page 4. Thus, manual operated valves should not be included within this scope.

4. Section C.1.b, page 7

The identification of ASME Code Class 1, 2 and 3 should be deleted as a blanket requirement. Therefore, we suggest that the last sentence of Section C.1.b be deleted.

5. Section C.1.c, page 7

This proposed position is written from the viewpoint of there always being a separate functional specification document. Unless this is the case, the referencing and identification requirements cannot be met. However, the use of two documents (a design specification and a functional specification) is entirely unnecessary and seems to be contrary to the allowed inclusion of the functional specification in the design specification as stated in position C.1.b and as allowed in ANSI N278.1.

6. Section C.2.a.(1), page 8

Manual valves should not be within the scope; see comment 3, delete.

7. Section C.2.b.(3), page 9

The seismic response spectra is not necessary. A reasonable technique is as already provided in N278.1, paragraph 3.2g (minimum fundamental frequency of the assembly).

8. Draft Value/Impact Statement

This value/impact statement is so general and brief that it, in essence, is meaningless. As a minimum, a quantative evaluation of the proposed Guide's effect on one of the NSSS standard reference system designs should be required. How many valves would this Guide affect? How much additional manpower would be required to just develop the documentation? Also, how would this ultimately affect the actual operability of the valve?

While the intent of imposing operability requirements on safety-related active valves is basically sound, this proposed Regulatory Guide substantially expands this scope by trying to include manually operated valves and unilaterally including all Quality Group classifications. This greatly exceeds any program to demonstrate valve assembly operability.

It appears that the "value" of this proposed Regulatory Guide is overstated and the "impact" is substantially understated, particularly as the Guide has been proposed.