Washington Public Power Supply System
A JOINT OPERATING AGENCY

P. O. Box 968 3000 Geo. Washington Way Richland Washington 99352 Phone (509) 375-5000

ELE-FJ-7[illegible] DOCKET NUMBER
PROPOSED RULE PR-Miscellaneous
Reg Guides

Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Subject: COMMENTS ON NRC DRAFT REGULATORY GUIDE "FUNCTIONAL SPECIFICATION FOR SAFETY-RELATED VALVE ASSEMBLIES IN NUCLEAR POWER PLANTS", DIVISION 1, TASK SC704-5

Dear Mr. Chilk:

The Washington Public Power Supply System has reviewed the subject Regulatory Guide and submits for your consideration the attached comments.

Very truly yours,

D L Renberger

D. L. RENBERGER
Assistant Director -
Technology

DLR:FJ:ct

Attachment

499 234

Acknowledged by card. 6/21/79 mwk

ATTACHMENT

1) Page 4 - Describes a problem of each individual standard having a specific goal with very little coordination between standards to accomplish the overall goal. It is a goal of this Regulatory Guide to provide a level of coordination to ensure that there is a set of comprehensive requirements to provide documentation that serves as the basis for construction, assurance of operability, inservice testing, etc.

   With this in mind, to accomplish the intent of this guide, IEEE qualification to 323, 344, etc. should be included. To neglect these in the overall design/testing of a mechanical item does not provide an integrated design.

2) Page 8, C.1.e - This statement should apply to all code cases and not just 1621-2.

3) Page 9, C.2.b - Once again, the requirements of this section should be coordinated with the requirements for IE equipment as required by Regulatory Guide 1.89 and IEEE 344.

4) Page 13

   The problem, as stated in the background, seems to be inherent in the system design more than the valve design. Valve assembly malfunctions due to application, environmental factors, and loading conditions are indicative of poor system design and the problem should be addressed with the designs in the form of system requirements, etc. It is not clear that identifying valve functional requirements in the design specification will eliminate this problem when the real problem may be in identifying the correct system parameters.

5) Regulatory Guide 1.26 defines Quality Group D systems and components as those which contain or may contain radioactive isotopes. On both BWRs and PWRs, Quality Group D is generally the BOP systems, and are not "safety-related". In this proposed guide, the NRC is suggesting imposing requirements for design documentation on the BOP, a portion of the plant traditionally left to the Owner to control, e.g., WPPSS uses Quality Class II for those systems considered important to continued or reliable operation of the plant. We recommend that reference to Quality Group D be removed from the draft guide (see Section C.1.d).

6) Considering the number and magnitude of the NRC's supplemental requirements to ANSI N278.1, we recommend that the ANSI standard be rewritten to implement the NRC's requirements. The new standard should then be referenced in whole without modification by the NRC.

General

1) The use of a Regulatory Guide as a means of making gross revisions to an ANSI standard is inappropriate as it leads to confusion in cross-references, misinterpretation, and compounds the difficulty of implementation.

2) In summary, this guide, if rewritten, could become a useful tool in assembling a valve design specification. The guide must include the requirements of the valve and operator, however, to obtain an "integrated design". Application of this guide and inclusion of the functional specification in the design specification should not be expected to solve the problem of valve malfunction which is caused by poor system design.