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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 27 1979

Mr. W. P. Johnson
Vice President
Yankee Atomic Electric Company
20 Turnpike Road
Westborough, MA 01581

Dear Mr. Johnson:

In your letter of June 21, 1979, you presented several comments regarding the content of Revision 1 to Section 14.2 of the Standard Review Plan (NUREG-75/087). Our response to each of your comments is given below.

Comment: Section I.6 discusses conformance with regulatory guides. The previous revision required a position of conformance with regards to the regulatory guide "that is appropriate at the time the FSAR is tendered for review." Does deletion of this statement indicate that we must reevaluate our position each time a regulatory guide is revised up to the time of license issuance?

Response: Each new regulatory guide or revision to an existing regulatory guide that is issued now includes a section entitled, "Implementation" which describes the applicability of that revision to certain categories of plants. At the time the original SRP was issued, this section was not included in new regulatory guides or revisions. You should review the Implementation section of each new regulatory guide or revision to determine its applicability to your plant(s). If a new regulatory guide or a revision is to be implemented on your plant, you will be expected to address that new guidance in your FSAR. The deletion of the words you identified in the original SRP simply recognizes this relatively new procedure.

Comment: Section II.10.f requires that test procedures be in a form suitable for review by regulatory inspectors at least 60 days prior to their intended use. It is our belief that a lead time of this duration for regulatory review of all tests required by the SRP is excessive.

Response: This time is required to enable the NRC Office of Inspection and Enforcement to implement its inspection program and consistent with Appendix B (second paragraph) to Regulatory Guide 1.68, "Initial Test Programs for Water-Cooled Nuclear Power Plants," Revision 2, August 1978. As stated in this regulatory guide, possession of procedures by NRC personnel should not impede the revision, review, or refinement of the procedures by the applicant. The plant design is essentially finalized far in advance of the beginning of the preoperational test program and it is our position that 60 days prior to test performance is not an excessive lead time for having test procedures available for NRC review to assure that the requirements for public health and safety are met.

Comment: Section II.11 has expanded the scope of individual plant system testing addressed in the FSAR from essentially safety-related and technical specifications related systems to all plant systems used for normal plant shutdown and cooldown and waste processing. This "minor" change has doubled the scope of the work effort involved in both the FSAR submittal and the regulatory review discussed in the previous comment.

Response: The original Standard Review Plan Section 14.2 (November 24, 1975) required (in II.7) that the test program be consistent with the positions in all applicable regulatory guides. Regulatory Guide 1.68, November 1973, identified most of the systems, structures, and components addressed in the six criteria listed in Section II.11 of Standard Review Plan Section 14.2, Revision 1. For example, Regulatory Guide 1.68, November 1973, identified radioactive waste, component cooling, service water, and the power conversion systems as ones that should be tested. These systems are not necessarily "safety-related" or related to the technical specifications. It is our position that the revised Standard Review Plan Section 14.2 now includes a more complete listing of SSC's that could affect safety, either directly or indirectly, consistent with the six criteria given in Section C.1 of the regulatory guide. Our experience with application of the new Regulatory Guide 1.68 in the review of other SAR's is that it has not caused a large increase in the scope of the work effort necessary for FSAR submittal or regulatory review. Section II.11 of Standard Review Plan Section 14.2 and Regulatory Guide 1.68, Revision 2, August 1978, were revised to give more detailed guidance on reviewing and conducting the test program.

Comment: Section II.11 requires that test abstracts be written for tests conducted during the initial test program and that these abstracts include "significant parameters and plant performance characteristics to be monitored." It is our position that this level of detail should not be in the FSAR but in the individual test procedure.

Response: The original Standard Review Plan Section 14.2 (in II.12) required test objectives, methods, and acceptance criteria to be reviewed. For many tests, significant parameters and plant performance characteristics must be included in the description of these objectives, methods, and acceptance criteria to enable the reviewer to determine that the functional adequacy of structures, systems, and components will be demonstrated. The Standard Review Plan was revised to clarify this.

Comment: Section II.11 states as follows: "If the method for testing of a structure, system, or component will not subject the item or system under test to representative design operating conditions, the test abstract should contain sufficient information to justify the test method to be used." Many of the tests performed during initial startup programs simulate plant conditions to determine proper response of systems and equipment during postulated transient or accident conditions. The wording of the above statement could easily be interpreted to require a detailed justification for all tests which simulate plant conditions. It is our position that this justification adds nothing substantive to the FSAR and should be deleted.

Response: It is not the intent of this statement to require justification each time plant conditions are simulated. However, if a system or component cannot be tested at conditions which demonstrate its design capability, sufficient information must be provided to justify why the test cannot be performed and to assure that the system or component can perform at its design capability. For example, there may be no practical way to simulate post-LOCA heat loads to which some equipment rooms containing engineered safety features will be subjected. If the ventilation system for those rooms is to be tested at a lower heat load, you must provide sufficient information to assure us that necessary extrapolations will be performed to verify that the ventilation system actually has the capability to remove its design heat load from the rooms.

Comment: Section V references Regulatory Guide 1.8 - "Personnel Selection and Training." At present Regulatory Guide 1.8 does not address test personnel, but proposed Rev. 2 substantially increases the qualification and training requirements of personnel directing preop and startup tests. At the same time, Regulatory Guide 1.58, as presently written, specifically includes personnel requirements during preop and initial startup test programs. Therefore, the reference to Regulatory Guide 1.8 should be changed to Regulatory Guide 1.58.

Response: Proposed Revision 2 to Regulatory Guide 1.8 states our current position regarding qualification requirements for personnel directing the conduct of preoperational and startup tests. Proposed Revision 1 to Regulatory Guide 1.58 references Regulatory Guide 1.8 for qualifications of these personnel.

Comment: Section V references Regulatory Guide 1.33 - "Quality Assurance Program Requirements (Operation)" and Section II.6 requires conformance with referenced regulatory guides. Regulatory Guide 1.33 endorses ANSI 18.7-1976/ ANS 3.2 "to commence with initial fuel loading, except for certain preoperational activities." Since Regulatory Guide 1.33 mainly discusses QA during plant operation it appears that Section 17 of the FSAR would be a more logical place to discuss conformance with Regulatory Guide 1.33 than Section 14.

Response: This is correct. Revision 1 to Standard Review Plan Section 17.1 verifies that the preoperational test program is conducted under the proper quality assurance controls, and this is reviewed in Chapter 17 of the FSAR. However, the initial test program, as described in FSAR Chapter 14, should be in accordance with the quality assurance program commitments in Chapter 17.

Comment: Section V references Regulatory Guide 1.128 - "Installation Design and Installation of Large Lead Storage Batteries for Nuclear Power Plants." This guide has nothing to do with initial test programs and should be deleted.

Response: Regulatory Guide 1.128 and IEEE Std. 484-1975 (which it endorses) address acceptance testing of batteries and refer to IEEE Std. 450-1975. This standard describes a recommended procedure for conducting battery capacity tests which are required as part of the preoperational testing of Class 1E batteries.

Comment: Yankee Atomic Electric Company views Revision 1 of Section 14.2 of the Standard Review Plan with considerable concern. Yankee, responsible for project management of the Seabrook Units 1 & 2, is currently preparing the FSAR for submittal. Much of this preparation has been devoted to the Initial Plant Test Program which now must be substantially revised to reflect the additional writing requirements and justifications required by Section 14.2, Revision 1, It is our belief that this additional effort is superfluous and will provide no improvement of content or quality of the test program.

Response: Standard Review Plan Section 14.2 was revised to clarify our requirements for initial test program descriptions to assure safe operation of the plant and to make this section of the Standard Review Plan consistent with current staff practice and Regulatory Guide 1.68, Revision 2. It is our position that any necessary effort that may be required because of Revision 1 to Section 14.1 of the Standard Review Plan is warranted by the increased degree of inspectability of your test program and the increased assurance of safe operation of your plant.

If Yankee Atomic Electric Company has any further questions concerning the staff review of the initial test program as described in Revision 1 to Section 14.2 of the Standard Review Plan, please do not hesitate to contact me.

Sincerely,

Original Signed by.
Donald J. Skovholt

Donald J. Skovholt, Assistant Director
for Quality Assurance & Operations
Division of Project Management

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