Enclosure 1

Consumers Power Company

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Mr Harold R Denton
Director, Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

STATUS OF EPRI PWR SAFETY AND RELIEF VALVE TEST PROGRAM
NUREG-0737, ITEM II.D.1

In December, 1979 forty-one utilities* with planned or operating pressurized water reactors committed to be responsive to the recommendations of NUREG-0578, Section 2.1.2 and demonstrate the capability of safety and relief valves to operate satisfactorily under expected operating and accident conditions. By letter dated July 8, 1980 Revision 1 of the EPRI "Program Plan for the Performance Testing of PWR Safety Relief Valves" was submitted to the NRC. This revision addresses Item II.D.1.A of NUREG-0737, which provided NRC clarifications to the earlier NUREG recommendations.

The program plan developed by EPRI for the participating PWR utilities is an extensive testing and aralysis effort which is utilizing three test facilities and will cost in excess of $20 million. The program has been "success" oriented with very little contingency time or funds to resolve potential problems. Although the program has been very successful and preliminary results-to-date indicate that the valves tested will perform their intended safety function, more information appears needed in selected areas. Additional tests, outside the July, 1980 Plan test matrix, are being performed. These additional tests of both safety and relief valves have been informally discussed with the NRC staff. The principal area requiring more testing and evaluation of relief valves is the impact of variable loop seal temperature on the valve operation. Revisions to the safety valve test matrix are necessary to obtain a better understanding of upstream pipe/valve interaction. The impact on the overall test schedule is provided in Attachment 1.

By previous agreement (R C Youngdahl letter to D G Eisenhut, dated December 15, 1980) the PWR utilities agreed to submit the attached Interim Data Report. This report provides all preliminary data collected through June 19, 1981. Additional quick look data reports and weekly activities reports will continue to be provided to the NRC staff until all testing is completed. The PWR utilities still intend to meet the commitment dates provided in the December 15, 1980 letter except that the <u>final</u> data report will not be provided by October 1, 1981.

*Six external organizations have since agreed to participate in the EPRI program (Combustion Engineering, Framatome, Central Nuclear de Almaraz, Furnas Electricas, Electronucleair and Swedish State Power Board).

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Separate from the safety and relief valve test program NUREG-0737, Item II.D.1.B requested that utilities provide verification of block valve functionability. During earlier meetings with the NRC staff, the utilities participating in the EPRI valve program concluded that emphasis must be placed on the demonstration of safety and relief valve operability but that EPRI would be requested to develop a block valve task action plan. The PWR utilities have reviewed a proposed action plan and are now prepared to discuss the need, depth and schedule of a possible block valve program.

While it is recognized that the schedules to satisfy the recommendations of NUREG-0737, Item II.D.1 are not totally consistent with the NRC's request, EPRI and the PWR utilities have instituted a program that is providing new scientific supportable data about valve operability which is not available from any other source.

The utility advisory groups coordinating the test program and EPRI are prepared to meet with the NRC staff to discuss the status of EPRI program in more detail. I propose to meet with you and your staff on July 16 or 17, 1981.

R C Youngdahl
Chairman, EPRI
Research Advisory Committee

ENCLOSURE 2