

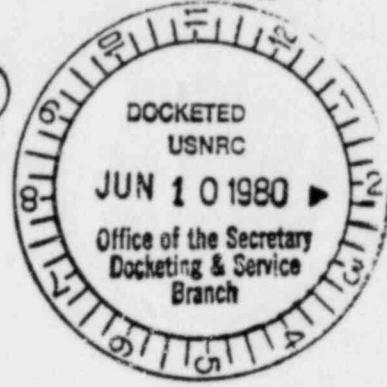
NUREG-75/087

DOCKET NUMBER
PROPOSED RULE

PR-Misc. Notice
Standard Review Plan
(45 FR 36236) ①

June 6, 1980

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555



Attention: Docketing and Service Branch

Gentlemen:

Our firm is in receipt of an Office of Nuclear Reactor Regulation proposed revision to Standard Review Plan PSRF-3.9.6 (Rev. 2) which is titled "Inservice Testing of Pumps and Valves." We appreciate this opportunity given to us in your solicitation of our comments.

As the NRC undoubtedly knows, we are a responsible valve and actuating system supplier to the nuclear industry. We are committed to enhancing the nuclear safety philosophy and its engineering. Our Topical Report No. G+W-FSD-2538, filed with the NRC and titled "Nuclear Main Steam Isolation Valve Systems", is referred to in one of our comments. That Topical Report clearly exhibits the depth of our interest in the enhancement of Nuclear Safety. Our comments are separately provided in the subsequent discussions.

--COMMENT: We urge that Paragraph II 2 include as subparagraph II 2.C. the following:

"To be acceptable, the SAR must contain the information required by Paragraph II 3."

--REASON: The requirements of Paragraph II 3 do not appear to be invoked upon the reviewer in the same context as paragraphs 2A and 2B.

--COMMENT: We urge that Paragraph IV be rewritten to delete the incorrect statement which now reads:

"To ensure that safety related ASME Code Class 1, 2, and 3 pumps and valves will be in a state of operational readiness to perform necessary safety functions throughout the life of the plant".

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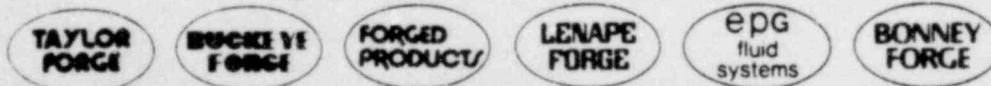


The statement in the staff's evaluation report would then more correctly read,

"A test program is provided which includes base-line pre-service testing and periodic in-service testing. The program provides for both functional testing of the components in the operating state and for visual inspection for leaks and other signs of distress."

- REASON: "Ensure" is an incorrect assumption on NRC's part and incorrectly makes NRC a technical pinnacle of engineering knowledge which without details of design, construction, etc., usurps the applicant's responsibility. Further, some segments of the industry have not been providing details in design control which addresses structural clearances within the valve and its operating system. Section 6.5 and 6.6 of our Topical Report discusses the formulation necessary to address clearances. It follows that where operability of the valve system is required in an accident sequence, without prior analysis and evaluation of clearances under continuing and maximum combined flow and structural loads, the imposed in-service test will not provide the "to ensure" answer. However, the testing is of help in this case as a progressive maintenance tool and our comment redraft provides for that.
- COMMENT: Within the proposed rewrite, we urge that the word "visual" be deleted.
- REASON: So that the intent of your Appendix A and of Section XI of the Boiler Code will not be abridged through individual interpretations. Both require more than visual.
- COMMENT: Within the cost implications of the "Impact Assessment for Appendix A", the NRC evaluation of costs and of potential problems resulting from the proposed valve system leakage taps in retrofit is rather incomplete.
- REASON: On retrofit, cost of QA/QC control procedures, personnel training, and qualification control over loose material resulting during material penetration work, etc., appear to be missing in the evaluation. The

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rework material is Coded material and pressure retaining. Thus, NRC will require these controls.

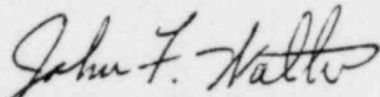
—COMMENT: As a general comment, some of my staff find that NRC people drafting these Standard Review Plans are mixing up and misjudging their responsibility. They are incorrectly providing design details and design philosophy.

A case in point is within Appendix A where the frequency of leak testing, number to a group of valves to be tested and an allowable leakage limit of 1.0 gpm for each valve are all postulated. While NRC personnel will argue that these Standard Review Plans are for NRC personnel's use only, the fact is that they often become engineering standards in the applicant's procedures. NRC should avoid these connotations which in fact may create or contribute to NRC assuming responsibility for a design characteristic which may be incorrect. A rather detailed NRC study of this situation, in our opinion is warranted. The burden of design for safety should be placed directly upon the applicant and his support and not assumed by NRC personnel.

In closing, should questions arise pertinent to the above, please feel free to call me directly.

Sincerely,

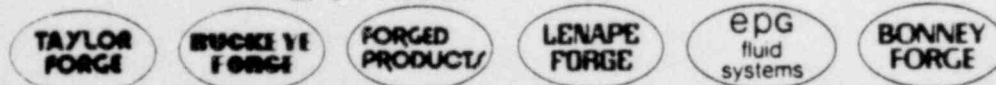
G+W FLUID SYSTEMS


Dr. John F. Walter
General Manager

/pfr

cc: Leslie E. Alsager

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