

ARIZONA



PUBLIC SERVICE COMPANY

P. O. BOX 21666 · PHOENIX, ARIZONA 85036

June 27, 1980

ANPP-15749 - JMA/KWG

DOCKET NUMBER

PROPOSED RULE

PR-Misc Notice ^②
Standard Review Plan
(45 FR 36236)

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

Attention: Docketing and Service Branch

Subject: Comments on Proposed Standard Review
Plan 3.9.6, Rev. 2
File: 80-010-026



Dear Sir:

Arizona Public Service Company has reviewed the subject Proposed Standard Review Plan. Our comments are attached.

Very truly yours,

E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

EEVBJr/KWG/av
Attachment

cc: J. M. Allen
A. C. Rogers
W. F. Quinn
F. W. Hartley (w/attach.)
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Acknowledged by card... 7/16/80... mdy...

COMMENTS ON P.S.R.P. 3.9.6

Paragraph 1.1.a

This paragraph requires testing of valves and pumps which are required only for pressure testing. Since this is not directly related to safety, we do not believe it should be included.

Paragraph 1.1.b

To measure the speed for synchronous motors if pressure and flow rate of the pump is also measured is redundant, and generates no information of additional value.

Appendix A, Paragraph 4.A

The need to test the valves every time disturbed was questioned. We believe that an exemption for disturbances during shutdown should be included. This exemption would require testing once, immediately prior to resumption of operations.

Appendix A, Paragraph 8

The allowable leak rate of one gpm is not justified in the proposed S.R.P, and a differential pressure (Δp) dependent requirement would better describe the leakage limits.

Finally, concern was expressed as to the impact of this revision on the construction of our plants. Without assessing the actual impact, it appears that the increased costs are greater than those described in the Impact Assessment.