ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

TELEPHONE
AREA CODE 716 546-2700

DOCKET NUMBER
PROPOSED RULE PR-Misc Notice (3)
Standard Review Plan
(45 FR 36236)

July 18, 1980

DOCKETED
USNRC
JUL 22 1980
Office of the Secretary
Docketing & Service
Branch
mdv

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Branch

Dear Sir:

Rochester Gas and Electric Corporation is pleased to submit the following comments concerning Proposed Revision, Standard Review Plan, PSRP-3.9.6 (Rev. 2) "Inservice Testing of Pumps and Valves", and the attached Appendix A and Value-Impact Statement:

1) It is not clear why the change from "reference values" to "procedures" was made in I.1.b. It would be most appropriate to maintain procedure review as an Office of Inspection and Enforcement function.

2) Paragraph II.3.e appears to be an unnecessary additional request for information, since the "basis for requesting relief" in paragraph II.3.c will include an explanation of "why the proposed inservice testing will provide an acceptable level of quality...". Also, the last phrase of II.3.e is merely gratuitous, and should be deleted.

3) It is apparent from the Value-Impact Statement that the proposed Appendix A requirements for requiring leak testing of valves between the Reactor Coolant System and low pressure systems stems from the WASH-1400 Event V scenario. As evaluated in WASH-1400, a check valve at the interface between the high and low pressure systems is postulated to rupture at a time when the redundant series check valve had already suffered a "failed-open", but undetected, failure.

RG&E agrees that this particular scenario could be a major contributor to accident risk, and that any comparable check valve arrangements should have scrupulous leak-rate testing provisions. However, the testing provisions espoused by this proposed SRP are being applied to valve configurations not envisioned by WASH-1400 as being of concern. For example, the random independent failure of three check valves in series within

IDR 5
FAC 1.C

Acknowledged by card 7/22/80 mdv.

8008270440

any chosen time frame does not appear to be of sufficiently high probability to require any additional special precautions to be implemented. RG&E, therefore, suggests that this proposed SRP be modified to explicitly apply only to situations comparable to the referenced areas of concern (WASH-1400), rather than being qualitatively extrapolated to non-applicable configurations for which additional testing provisions would result in little, if any, value/impact.

4) The sixth paragraph of proposed Appendix A states that the Class 1 to Class 2 boundary is chosen as the isolation point to be protected. Since this particular interface may be at the RCS design pressure, no protection would be required. Protection is needed at the interface between high and low pressure piping, irrespective of ASME Code Class designation.

5) The allowable leakage rate of 1.0 gpm is obviously a convenient, arbitrarily chosen value. RG&E suggests that each facility determine the particular allowable leakage rate acceptable for each particular valve (subject to NRC review and approval). The capacity of protective relief valves in the low pressure system may be a proper value, for instance.

6) The one year time frame for compliance with this proposed Appendix is not a reasonable schedule. This implementation schedule should be modified to "within one year following the next scheduled refueling outage". The WASH-1400 probability figures of failure per year would certainly allow this more reasonable schedule.

7) Based on past experience with installing vent and drain connections to determine containment isolation valve leakage, we find the NRC cost estimate quite low. We would expect each fully-assembled Class 1 system to cost in excess of $40,000. Although this figure does not rival the reputed $100 million benefit, it is substantially more than the $5-15,000 NRC estimate.

We hope that these comments will be of benefit to you during the subsequent revision of this SRP Section.

Sincerely,

John E. Arthur
Chief Engineer