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ELECTRIC ENGINEERING
DEPARTMENT

DOCKET NUMBER PR-Misc Notice (13)
PROPOSED RULE

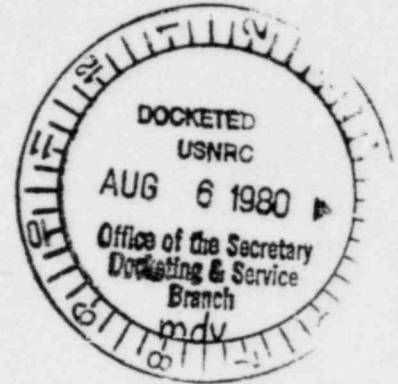
July 28, 1980

Standard Review Plan
(45 FR 36236)

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

Attn: Docketing and Service Branch

Subject: Comments on Proposed Revision to
Standard Review Plan
PSRP - 3.9.6 (Rev. 2)



Gentlemen:

Attached are our comments on the subject proposed revision. We wish to highlight, however, our general disagreement with the apparent underlying philosophy indicated in proposed Appendix A to the Revision, i.e. that operating plants be required to comply with the SRP position within one year of its approval. Specifically, we have the following concerns with this approach:

1. The Standard Review Plan (SRP) is not the proper forum for enumerating new requirements to be backfitted onto licensed facilities. The purpose of the SRP, as you are aware, is to provide guidance to the NRC Staff in their review of new applications for CP's and OL's and to provide licensees with insight concerning the specific areas of Staff review and the accompanying criteria for such review.
2. The issue of LOCA's which bypass containment has recently been addressed by NRC in a letter to licensees concerning systems with a double check valve isolation arrangement. It is assumed that the NRC Staff has received specific design information on this matter from each licensee and has evaluated it for adequacy. Specific concerns should be taken up with licensees on a case-by-case basis. In addition, the potential for a "containment bypass LOCA" will undoubtedly be evaluated in Phase II of the Interim Reliability Evaluation Program. It is, therefore, inappropriate to mandate a generic change to a specific facility before a risk assessment is performed on that facility to determine if the risk to the public from an event involving those systems and components is truly significant enough to warrant such change.

Very truly yours,

R. C. L. Olson
Principal Engineer

8009030014

Acknowledged by card 8/6/80. m.dv...

Secretary of the Commission

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July 28, 1980

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire

COMMENTS ON PSRS - 3.9.6 (Rev. 2)

I. AREAS OF REVIEW

- I.1. Sect. XI does not require testing of pumps required for system pressure tests; could be construed to include hydro pumps. Therefore, in I.1.a., the words "whose function is required for safety and system pressure tests" should be deleted.
Justification: IWP-1100 clearly defines the scope of testing.
- I.2. Sect. XI does not address testing of valves required for system pressure tests. Therefore, in I.2., the words "whose function is required for safety and system pressure tests" should be deleted. Also, IWV-1200 is not limited to exempting only non-safety related valves.
Justification: IWV-1100 and IWV-1200 clearly define the scope of testing.

II. ACCEPTANCE CRITERIA

- II.2.a. Change the first sentence to read; "To be acceptable, the SAR valve test list must contain all Code Class 1, 2, and 3 valves required by IWV-1100 except those valves exempted by IWV-1200."
Justification: IWV-1100 and IWV-1200 clearly define the scope of testing.
- II.2.a. Delete the reference to Appendix A to this SRP section.
Justification: IWV-2200 defines the categories of valves.
- II.2.b. Delete this reference to Appendix A to this SRP section.
Justification: See comments to Appendix A.

COMMENTS TO PROPOSED APPENDIX A TO SRP - 3.9.6 (Rev. 2)

These requirements are not addressed in the code and are not currently regulations. Possible problem areas with Appendix A are that it:

1. Gives no credit for pressure indicators or alarms which could indicate valve leakage;
2. Would necessitate retesting SI check valves after terminating SDC, after ECCS actuation, or even after routine operations such as making up to SIT;
3. Gives no credit for more than 2 isolation valves. We have previously argued that this feature provides additional assurance against backleakage from the RCS;
4. Specifies that the Class I/Class II boundary will be the isolation point. This appears arbitrary in that some Class II piping has the same rating as Class I piping. The definition in Appendix A eliminates one check valve for which credit could otherwise be taken.

The proposed appendix does not give credit for the current test program required by the tech specs and ASME Section XI. Since leak testing programs are presently in effect, performing the requirements listed in Appendix A would be in conflict with the philosophy of maintaining occupational radiation exposure at levels that are as low as is reasonably achievable.

The proposed appendix is primarily concerned with an intersystem LOCA and the possibility of having a LOCA outside of the containment. Current test programs test all containment penetrations that are required to be shut during a LOCA. These tests include all lines that connect to the RCS, for example,

- a. CVCS charging line
- b. CVCS letdown line
- c. RCS sample line
- d. SDC system suction line
- e. RCP controlled bleed off

Containment integrity in the event of a LOCA is assured by the test program established by the tech specs and ASME Section XI Code. And if operability of these valves is assured for containment integrity, their integrity should be assured to prevent over pressurizing a low pressure system. The allowable leakage requirement for containment integrity is much lower than the 1 gpm limit in the proposed Appendix.

The case for the safety injection lines is slightly different. There are no quantitative leakage checks performed on the safety injection valves leading to the RCS. However, overpressure protection for the low pressure lines located outside of the containment is assured by:

- a. multiple valves in series
- b. relief valves on the low pressure lines
- c. line pressure indication and alarms

Therefore, there is no justification to implement the leak test program for the safety injection valves as described in the proposed Appendix A.

The other systems that connect to the RCS are the quench tank and RC drain tank. The quench tank has multiple monitoring devices designed to detect leakage. The RC drain tank has over pressure protection, and pressure and level indication and a level alarm. Again there is no justification for implementing the program described in the proposed appendix.

Comments to Valve - Impact Statement For
Proposed Appendix A to SRP 3.9.6

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WASH-1400 was completed prior to inservice testing of pumps and valves, therefore, no credit is taken for the current pump and valve test program. Therefore, the probability of 1.7×10^{-4} for an intersystem LOCA is questionable. (Does this probability assume testing of all valves under the current ASME Section XI Code?)

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The cost of implementing this test program does not take into account replacement energy cost due to additional outage time for testing.