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PR - Standard Review PLAN
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Secretary of the Commission
Docketing & Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Enclosed are comments on the Proposed Revision to Standard Review Plan PSRP-3.9.6 (Rev. 2) Draft 1, In-service Testing of Pumps and Valves, Appendix A to SRP 3.9.6 Leak Testing of Pressure Isolation Valves Rev. 0, Draft 1, and Value Impact Statement for Proposed Appendix A to SRP 3.9.6.

We appreciate having been given the opportunity to comment.

Yours very truly,

J.S. Loomis, Head
Nuclear Safeguards & Licensing Div.

JSL:LAL:cjr
Enclosure
Copies:
R. F. Janecek (1/1)
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NSLD File: 1B-4 (1/1)

Acknowledged by card AEW 8-14-80

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- Sargent & Lundy Comments on Proposed Revision to Standard Review Plan PSKP-3.9.6 (Rev. 2) Draft 1, Inservice Testing of Pumps and Valves, Appendix A to SRP 3.9.6 Leak Testing of Pressure Isolation Valves Rev. 0, Draft 1, and
- Value Impact Statement for Proposed Appendix A to SRP 3.9.6

General Comments

An explanation should be provided that defines the applicability and differentiates the testing requirements between 10CFR50 Appendix J and ASME Section XI. This would be necessary to eliminate confusion on the part of the reviewer and the applicant as to which requirement is to be followed. In the past, confusion has resulted between several NRC branches and the applicant in the review of these testing requirements. Defining of testing between 10CFR50 Appendix J and ASME XI should remedy the problem.

Specific Comments

Paragraph II.3.e

The requirement to provide an explanation as to why the in-service testing will "not endanger the public health and safety" should be removed. This should be considered by the staff and not the applicant. If other requirements are satisfied, this fact should be apparent. The requirement to provide an explanation that an "acceptable level of quality and safety" is sufficient. Please note that an inconsistency exists between 3e and item a&b in the next paragraph.

Appendix A, Page 3.9.6-5

We feel that operational experience should be used to justify the frequency of testing isolation valves.

Each utility will be affected by this requirement in a different manner. For some, this testing will be nil but for others it could become a very burdensome activity. The periodic leak test rate should be determined by operational experience on a plant-by-plant basis. Valves could then be tested at every other refueling or some other agreed upon interval.