

**Florida
Power
CORPORATION**

July 31, 1980

File: 3-0-3-a-3

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

Attention: Docketing and Service Branch

Dear Sirs:

The following comments are submitted on the proposed revision to the Standard Review Plan Section 3.9.6.

I.1.a. The deletion of the qualifier "provided with an emergency power source" and the inclusion of "System Pressure Tests" are (a) increases in the scope of the present program; (b) in conflict with ASME Section XI Article IWP 1000; and (c) not contributory to the enhancement of plant safety.

I.1.a and d (also II.2.a, III.1.d, and 2.a). References to information contained in SAR would be difficult to specifically identify for plants whose SARs preceded requirements of 10 CFR Part 50.55A (G). We recommend use of terminology "Owners submitted ISI plan" rather than SAR.

I.2 Inservice Testing of Valves "...whose function is required for safety and system pressure tests." The addition of "and system pressure tests" increases the scope of the program. Same comments as for I.1. above.

II.2.a Use of "non-safety related valves" is a significant increase in scope over ASME Section XI. Many Code Class 1, 2, and 3 safety related valves are exempted from the program by IWP-1200.

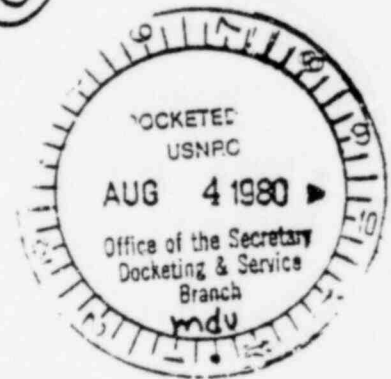
Appendix A General

It is unclear whether the scope of Appendix A is limited to leak testing of two or more valves in series which constitute a pressure isolation boundary between Class I and Class II systems. We recommend clarification.

Appendix A "Frequency of Leak Testing of Isolation Valves will be: a.each time the valves are disturbed because of flow in the line." This represents a new requirement which would increase personnel exposure to radiation unnecessarily and is regarded as being unreasonable and capricious. Testing at refueling is a current requirement, and no justification for change is perceived.

DOCKET NUMBER
PROPOSED RULE

PR-Misc Notice ⁽¹⁰⁾
Standard Review Plan
(45 FR 36236)



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Acknowledged by card 8-4-80 mdv.

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Also, "50% of RCS design pressure" is not germane or consistent with arbitrary acceptable leak rate of 1 gpm. This should be determined by system capacity and relief capability.

Appendix A "All Leak Tests will be performed just prior to resuming power operations as the plant is pressurized...." This change could cause an unwarranted increase in outage time to each utility at great cost with no commensurate benefit.

Appendix A "In cases where pressure isolation is provided by two valves, both will be independently leak tested." This is not practical when one is a check valve and the other a block valve.

Also, the maximum allowable leakage limit of 10 gpm is arbitrary and does not consider system capacities.

Once agreement is reached upon modifications necessary to meet revised requirements to SRP 3.9.6, considerably more than one (1) year will be required to design modifications, procure equipment, schedule outages, and perform needed work. The addition of test connections will necessitate plant shutdown, installation of equipment on contaminated systems, and testing following installation. We recommend that more than one (1) year to implement needed changes on operating plants be scheduled.

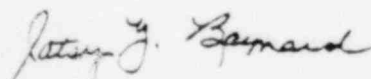
Impact Assessment Post-CP. No consideration is given to the added cost of performing the testing which extends outages as described above. Also, the added time to perform testing during plant startup, as stipulated above, would significantly increase utility costs due to increasing the plant unavailability times. Additionally, no utility cost figures were calculated for reviewing, revising, and rewriting all affected plant operating maintenance and surveillance procedures or the currently submitted ISI plans.

Your consideration of these comments in rewriting or revising the Standard Review Plan, Section 3.9.6, is appreciated.

If there are any questions, please do not hesitate to call us.

Very truly yours,

FLORIDA POWER CORPORATION



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