EG&G Idaho, Inc.

P.O. BOX 1625, IDAHO FALLS, IDAHO 83415

DOCKET NUMBER
PROPOSED RULE PR-Misc Notice (7)
Standard Review Plan
(45 FR 36236)

July 30, 1980

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

Attention: Docketing and Service Branch

COMMENTS ON PSRP-3.9.6 (REV. 2) - JAD-193-80

Gentlemen:

Enclosed for your information are comments on the proposed Revision 2 to Standard Review Plan SRP-3.9.6. If you have any questions about the comments, please do not hesitate to contact us.

Very truly yours,

ORIGINAL SIGNED BY

J. A. Dearien, Manager
Code Assessment and
Applications Program

REL:srw

Enclosure:
As Stated

cc: R. E. Tiller, DOE-ID
R. W. Kiehn, EG&G Idaho w/o enclosure

Acknowledged by card. 8/4/80. mdv...

8008180143

COMMENTS ON PROPOSED REVISION
STANDARD REVIEW PLAN
PSRP-3.9.6 (Rev. 2)

1. The SRP refers to safety related Code Class 1, 2 and 3 pumps and valves as requiring periodic testing. There are also some safety related components which are not Code Class 1, 2 or 3 but which are required to be tested. Examples of these are some of the pumps and valves in the diesel fuel oil system. The wording of the SRP should be revised to be inclusive of these components.

2. NRC has been allowing non-safety related valves to be included in the IST program for the convenience of the applicant, provided that they are designated as such and with the understanding that they must be tested in accordance with ASME Section XI, with no relief to be granted. If this practice is to continue, it may be appropriate to include it in the SRP to assure consistent reviews.

3. The value impact statement for proposed Appendix A to the SRP does not support the requirement to leak check a valve each time it is disturbed because of flow in the line, but only addresses a one year test interval as compared to not testing during the 40 year plant life. Some valves (e.g., in the DHRS) may be disturbed any time the reactor is brought to a cold shutdown. The proposed Appendix A would appear to require a leak check as a prerequisite to returning to power. This could result in a significant delay in restart and the resulting additional cost from the extended outage could possibly not be offset by additional potential savings if the value impact analysis were expanded to cover testing more frequently than yearly. It would seem that leak testing each refueling outage combined with pressure monitoring between the check valves would provide an adequate margin of safety without significantly impacting normal plant operation.

Additional protection of the low pressure piping is also provided by safety valves which are installed on most low pressure systems. These provisions effectively eliminate both leakage/rupture failure modes described in NUREG-0677. Leakage through the high pressure check valve would be detected by the pressure monitoring between check valves, while rupture of the high pressure check valve followed by leakage through the low pressure check valve would be mitigated by the safety valves.

4. The implementation schedule for the application of proposed Appendix A to operating plants may be too tight. Some areas of concern are as follows:

a) Any plant modifications should be carefully evaluated to insure that new potential failure mechanisms or unresolved safety issues are not created in the implementation. Of particular concern is the fact that many of the modifications would have to be made during a plant shutdown. If the implementation were rushed to allow installation during a regularly scheduled shutdown early in the one year period, the evaluation may be inadequate.

b) Since some of the components would probably be ASME Section III components, the "standard off-the-shelf" availability of these components is questionable, especially if all operating plants are making modifications at the same time.

In order to alleviate these problems the following implementation schedule is proposed.

a) All plants should have their design evaluation completed within one year. Any procedural modifications could also be implemented within this interval.

b) Following any required NRC approvals, hardware modifications would then be made at the next shutdown of sufficient duration, subject to availability of components.

5. It may be appropriate to reference General Design Criteria 54, 55, 56 and 57 in the SRP to help alleviate some of the confusion previously encountered in the categorization and testing of containment isolation valves in the IST program.

EG&G Idaho, Inc.

P. O. Box 1625
Idaho Falls, Idaho 83401

July 30, 1980

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

Attention: Docketing and Service Branch

COMMENTS ON PSRP-3.9.6 (REV. 2) - JAD-193-80

Gentlemen:

Enclosed for your information are comments on the proposed Revision 2 to Standard Review Plan SRP-3.9.6. If you have any questions about the comments, please do not hesitate to contact us.

Very truly yours,

J. A. Dearien, Manager
Code Assessment and
Applications Program

REL:srw

Enclosure:
As Stated

cc: R. E. Tiller, DOE-ID
R. W. Kiehn, EG&G Idaho w/o enclosure

COMMENTS ON PROPOSED REVISION

STANDARD REVIEW PLAN

PSRP-3.9.6 (Rev. 2)

1. The SRP refers to safety related Code Class 1, 2 and 3 pumps and valves as requiring periodic testing. There are also some safety related components which are not Code Class 1, 2 or 3 but which are required to be tested. Examples of these are some of the pumps and valves in the diesel fuel oil system. The wording of the SRP should be revised to be inclusive of these components.

2. NRC has been allowing non-safety related valves to be included in the IST program for the convenience of the applicant, provided that they are designated as such and with the understanding that they must be tested in accordance with ASME Section XI, with no relief to be granted. If this practice is to continue, it may be appropriate to include it in the SRP to assure consistent reviews.

3. The value impact statement for proposed Appendix A to the SRP does not support the requirement to leak check a valve each time it is disturbed because of flow in the line, but only addresses a one year test interval as compared to not testing during the 40 year plant life. Some valves (e.g., in the DHRS) may be disturbed any time the reactor is brought to a cold shutdown. The proposed Appendix A would appear to require a leak check as a prerequisite to returning to power. This could result in a significant delay in restart and the resulting additional cost from the extended outage could possibly not be offset by additional potential savings if the value impact analysis were expanded to cover testing more frequently than yearly. It would seem that leak testing each refueling outage combined with pressure monitoring between the check valves would provide an adequate margin of safety without significantly impacting normal plant operation.

Additional protection of the low pressure piping is also provided by safety valves which are installed on most low pressure systems. These provisions effectively eliminate both leakage/rupture failure modes described in NUREG-0677. Leakage through the high pressure check valve would be detected by the pressure monitoring between check valves, while rupture of the high pressure check valve followed by leakage through the low pressure check valve would be mitigated by the safety valves.

4. The implementation schedule for the application of proposed Appendix A to operating plants may be too tight. Some areas of concern are as follows:

   a) Any plant modifications should be carefully evaluated to insure that new potential failure mechanisms or unresolved safety issues are not created in the implementation. Of particular concern is the fact that many of the modifications would have to be made during a plant shutdown. If the implementation were rushed to allow installation during a regularly scheduled shutdown early in the one year period, the evaluation may be inadequate.

   b) Since some of the components would probably be ASME Section III components, the "standard off-the-shelf" availability of these components is questionable, especially if all operating plants are making modifications at the same time.

   In order to alleviate these problems the following implementation schedule is proposed.

   a) All plants should have their design evaluation completed within one year. Any procedural modifications could also be implemented within this interval.

   b) Following any required NRC approvals, hardware modifications would then be made at the next shutdown of sufficient duration, subject to availability of components.

5. It may be appropriate to reference General Design Criteria 54, 55, 56 and 57 in the SRP to help alleviate some of the confusion previously encountered in the categorization and testing of containment isolation valves in the IST program.