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DOCKET NUMBER

PROPOSED RULE

PR-Misc Notice (4)

Standard Review Plan
(45 FR 36236)

July 24, 1980

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

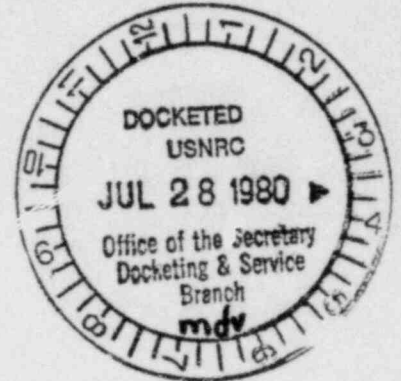
Attention: Docketing and Service Branch

Subject: Comments on Proposed Revision 2, Draft 1, of
Standard Review Plan 3.9.6

Gentlemen:

We have completed our review of proposed revision 2 to the Standard Review Plan Section 3.9.6, "Inservice Testing of Pumps and Valves". Our comments are as follows:

1. In Subsection I, 1.a, the NRC apparently intends to expand the scope of ISI testing by its inclusion of pumps and valves required for system pressure tests. However, the wording used in this and other sections restricts the scope to those pumps and valves required for both safety and system pressure tests. It is conceivable that no pumps fit that narrow range. We suggest that the wording be changed to require ISI testing for "those pumps and valves required for safety as well as those required for system pressure tests".
2. Subsection II, 1.a, indicates, in part, that the scope of the applicants test program is acceptable if it is in agreement with 1WP-1100 of Section XI of the Code. If this is true, then what is the intent of Subsection I, 1.a.?
3. In Subsection II, 2.a, the distinction should be made between non-active-safety-related valves, and non-safety-related valves. A strict reading of this section as it stands might require that instrument root valves be subjected to ISI testing, for which we see no benefit. Although an equally strict reading of 1WV-1100 would appear to exclude such unnecessary testing, we believe that clarification of this point is required.



Acknowledged by card.. 7/29/80. mdv..

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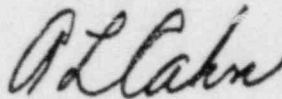
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Subsection II, 2.a, indicates, in part, that an acceptable SAR valve list must contain all safety-related Code Class 1, 2, and 3 valves required by LWV-1100. If this is true, then what is the intent of Subsection I, 2.?

Very truly yours,

A handwritten signature in cursive script, appearing to read "A.L. Cahn".

A.L. Cahn
Manager of Engineering
Thermal Power Management

ALC/RED:rb