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Subject: Standard Review Plan 3.9.6
Proposed Revision 2 Draft 1
Inservice Testing of Pumps and Valves

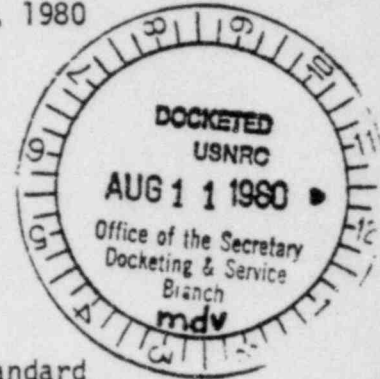
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DOCKET NUMBER
PROPOSED RULE

PR-Misc Notice (14)
Standard Review Plan
(45 FR 36236)

August 8, 1980

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



Attention: Docketing and Service Branch

Dear Sir:

Burns and Roe has reviewed the subject draft Standard Review Plan section, and would like to offer the following comments:

- (1) Page 3.9.6-5, fourth paragraph specifies a leak testing frequency of Category A isolation valves for "the RHR, Hot and Cold Leg LPI, LPCS and any other system rated at less than 50% of RCS design pressure".

We recommend that the frequency of leak testing reference the ASME Section XI requirements rather than having basis on a percentage of design pressure.

- (2) Page 3.9.6-5, seventh paragraph specifies than "In cases where pressure isolation is provided by two valves, both will be independently leak tested. When three or more valves provide isolation, only two of the valves need to be leak tested."

Where three or more valves provide isolation, all valves should be leak tested. If only two valves are to be leak tested, then the same two valves should be tested at each interval.

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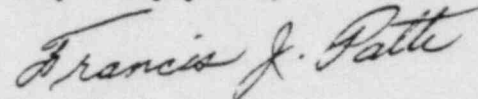
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- (3) Page 3.9.6-5, eighth paragraph specifies that "The allowable leakage limit will be 1.0 gpm for each valve."

We recommend that ASME Section XI paragraphs IWV-3426 and IWV-3427 be referenced, and that the 1.0 gpm requirement be removed.

Very truly yours,



Francis J. Patti
Chief Nuclear Engineer

FJP/SMK/gr