

Gibbs & Hill, Inc.
ENGINEERS DESIGNERS CONSTRUCTORS

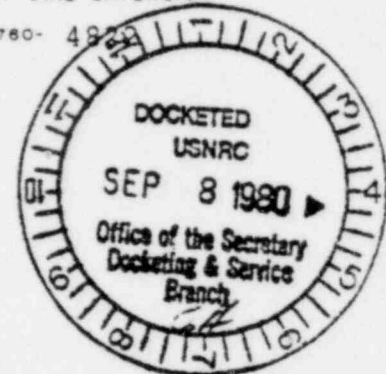
DOCKET NUMBER
PROPOSED RULE

PR *misc. notice*
Reg Guide

DIRECT DIAL EXTENSION

(212) 760- 4822

September 4, 1980



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

Attention: Docketing and Service Branch

Gentlemen:

Subject: Proposed Revision to Standard
Review Plan - 3.9.6 "Inservice
Testing of Pumps and Valves"

We have reviewed the subject document and have the following comments:

Appendix A to the proposed SRP requires that the valves which form the interface between the RCS and other systems whose design pressure is less than the rated RCS pressure be classified as Category A as described in Section XI Subsection IWV of the ASME B & PV Code. It further requires that for those systems rated at less than 50% of RCS design pressure, the testing frequency will be each time the valves are disturbed because of flow in the line. For all other systems, testing would be required once per refueling. In addition, leak testing must be performed just prior to resuming power operation as the plan is pressurized.

While many of these valves would be classified as Category A valves under the rules of Section XI, it is not immediately evident that all of these valves would be so classified. Moreover, Section XI requires leak testing of Category A valves at the same (or greater) frequency as scheduled refueling outages, but not less than once every two years. Section XI also allows testing during the refueling outage, using air or water as the test medium.

Proposed Appendix A imposes some additional requirements over and above the requirements of Section XI. However, the basis for all these new requirements seems to be that the NRC is assuming gross and rapid failure of the leak-tight integrity of several valves that are arranged in series. (A possible insight into the NRC's

Authorized by card

9/8/80 GCH

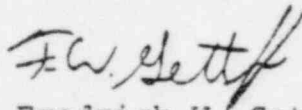
TH-11

assumptions can be found in the sixth paragraph of Section III of the value-impact statement, where the NRC refers to the "destroyed plant.")

It would seem that a more gradual reduction in the leak-tight integrity of these valves would occur in actuality allowing ample time to alert the plant operator to the situation. Instruments to detect a pressure increase could be installed in the low pressure piping to alert the plant operator. In many cases, these pressure instruments already exist. A more realistic approach should be undertaken, instead of imposing these more severe requirements.

The SRP is apparently being used as a tool for imposing new and more severe requirements. The proper place for these requirements is Subsection IWV of Section XI of the ASME B & PV Code, the regulations in 10 CFR Part 50 or a Regulatory Guide.

Sincerely,



Fredrick W. Gettler, Jr.
Vice President
Power Engineering

FWG:tma