



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 16, 1993

MEMORANDUM FOR: Document Control Desk
Document Management Branch
Division of Information Support Services
Office of Information Resources Management

FROM: Gail H. Marcus, Chief
Generic Communications Branch
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

SUBJECT: DOCUMENTS ASSOCIATED WITH THE PROPOSED SUPPLEMENT 1 TO
GENERIC LETTER 89-04, "GUIDANCE ON DEVELOPING ACCEPTABLE
INSERVICE TESTING PROGRAMS"

The Mechanical Engineering Branch has prepared the subject draft generic letter supplement. The Committee to Review Generic Requirements (CRGR) has reviewed and endorsed this draft generic communication. The Generic Communications Branch is preparing to publish the draft generic communication in the Federal Register for public comment. This memorandum provides a compilation of the background material relevant to the subject generic communication that should be made available to the public. By copy of this memorandum we are providing the enclosed documents to the Public Document Room. The enclosures are (1) the draft generic letter supplement as endorsed by CRGR and (2) the CRGR Review Package and the Generic Backfit Requirements Reporting Form.

We request that you provide us with the Nuclear Documents System accession number for this memorandum. This information can be provided to the listed contact by telephone or by E-Mail.

Gail H. Marcus, Chief
Generic Communications Branch
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosures: As Stated

CONTACT: Richard J. Kiessel, NRR
504-2840

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Draft Generic Letter

TO: ALL LICENSEES OF OPERATING NUCLEAR POWER PLANTS AND HOLDERS OF CONSTRUCTION PERMITS FOR NUCLEAR POWER PLANTS

SUBJECT: GUIDANCE ON DEVELOPING ACCEPTABLE INSERVICE TESTING PROGRAMS (GENERIC LETTER 89-04, SUPPLEMENT 1)

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this generic letter to notify you about the issuance of NUREG-1482, "Guidelines for Inservice Testing Programs at Nuclear Power Plants," and to make available the recommendations contained in NUREG-1482 for use by addressees who wish to use them. NUREG-1482 provides NRC recommendations for a number of generic issues concerning the implementation and development of inservice testing (IST) programs and includes the positions from Generic Letter 89-04 supplemented with the current considerations for using these positions.

Description of Circumstances

The staff is issuing NUREG-1482 to address the number of similar relief requests from various plants and to supplement the guidance of Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," to current American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* and regulatory issues.

Discussion

NUREG-1482 describes a historical and current perspective of the regulatory requirements for inservice testing of pumps and valves in nuclear power plants. It includes information on the format and content for inservice testing programs and relief requests, examples of relief requests, clarification of issues described in information notices or other NRC letters related to inservice testing, and the current considerations for positions included in GL 89-04.

Licensees may use the NUREG-1482 to develop relief requests, to implement portions of later editions of the ASME Code and Addenda incorporated in 10 CFR 50.55a(b), and to review alternatives acceptable to the staff. NUREG-1482 may be obtained from the Superintendent of Documents, U.S. Government Printing Office, P. O. Box 37802, Washington, D. C. 20013-7082.

Requested Actions

The generic letter does not request actions. The use of the guidance in NUREG-1482 is strictly voluntary.

Reporting Requirements

The generic letter does not require any reporting by addressees. However, if the guidance in NUREG-1482 is used to make changes to licensee IST programs, revised relief requests or program documents may need to be submitted to the NRC.

Backfit Discussion

The staff has not performed a backfit analysis because the information herein pertains to actions that are strictly voluntary.

Paperwork Reduction Act Statement

This generic letter contains voluntary information collection requirements that are subject to the Paperwork Reduction Act of 1980 (44 U.S.C. 3501 et seq.). These voluntary requirements were approved by the Office of Management and Budget, approval number 3150-0011.

The public reporting burden for this voluntary collection of information is estimated to average 80 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for further reducing reporting burden, to the Information and Records Management Branch (MNBB-7714), U.S. Nuclear Regulatory Commission, Washington, D.C. 20555; and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-3019, (3150-0011), Office of Management and Budget, Washington, D.C. 20503.

Compliance with the following request for information is purely voluntary. The information would assist NRC in evaluating the cost of complying with this generic letter:

- (1) the licensee staff time and costs to perform requested inspection, corrective actions, and associated testing;
- (2) the licensee staff time and costs to prepare the requested reports and documentation;
- (3) the additional short-term costs incurred as a result of the inspection findings such as the costs of the corrective actions or the costs or down time; and/or
- (4) as estimate of the additional long-term costs which will be incurred in the future as a result of implementing commitments such as the estimated costs of conducting future inspections or increased maintenance.

If you have any questions about this matter, please contact the technical contact listed below or the appropriate Office of Nuclear Reactor Regulation project manager.

Sincerely,

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

Technical contact: Patricia Campbell, NRR
(301)-504-1311

Lead project manager: Jacob Zimmerman, NRR
(301)-504-2426

CRGR REVIEW PACKAGE

PROPOSED ACTION: Issue a draft guidelines document on the development and implementation of inservice testing (IST) programs and nuclear power plants. Following a public comment period from a notice in the Federal Register, the guidelines will be finalized and issued for use.

CATEGORY: 2

RESPONSE TO REQUIREMENTS FOR CONTENT OF PACKAGE SUBMITTED FOR CRGR REVIEW

- (i) The proposed generic requirement or staff position as it is proposed to be sent out to licensees:

The revised staff position is contained in a draft NUREG format which will be made available for use by the licensees via a generic letter. A notice will be placed in the Federal Register requesting public comments. Following incorporation of the comments, as applicable, the generic letter and NUREG will be finalized and returned to CRGR.

- (ii) Draft staff papers or other underlying staff documents supporting the requirements or staff positions:

The draft NUREG includes a section listing documents referenced in the guidelines.

- (iii) Each proposed requirement or staff position shall contain the sponsoring office's position as to whether the proposal would increase requirements or staff positions, implement existing requirements or staff positions, or would relax or reduce existing requirements or staff positions.

Overall, the guidance relaxes requirements by approving the use of later editions of the ASME Code which relaxes certain requirements.

- (iv) The proposed method of implementation with the concurrence (and any comments) of OGC on the method proposed.

Many of the staff positions provide approval to implement portions of later editions of the ASME Code incorporated in § 50.55a without further NRC review, pursuant to 10 CFR 50.55a(f)(4)(iv). OGC reviewed this generic letter and NUREG and has no legal objections.

- (v) Regulatory analyses conforming to the directives and guidance of NUREG/BR-0058 and NUREG/CR-3568.

A formal regulatory analysis is not required for the generic letter and NUREG. The staff has determined that they do not constitute a "backfit" pursuant to 10 CFR 50.109. They clarify existing requirements and the implementation of these requirements; however, licensees will not be required to take any action in response to the issuance of the generic letter and NUREG.

- (vi) Identification of the category of reactor plants to which the generic requirement or staff position is to apply.

The guidance is applicable to all operating plants, but only to the extent that they choose to use the guidance.

- (vii) For backfits other than compliance or adequate protection backfits, a backfit analysis as defined in 10 CFR 50.109. The backfit analysis shall include, for each category of reactor plants, an evaluation which demonstrates how the action should be prioritized and scheduled in light of other ongoing regulatory activities. The backfit analysis shall document for consideration information concerning any of the following factors as may be appropriate and any other information relevant and material to the proposed action:

- (a) Statement of the specific objectives that the proposed action is designed to achieve;
- (b) General description of the activity that would be required by the licensee or applicant in order to complete the action;
- (c) Potential change in the risk to the public from the accidental release of radioactive material;
- (d) Potential impact on radiological exposure of facility employees and other onsite workers;
- (e) Installation and continuing costs associated with the action, including the cost of facility downtime or the cost of construction delay;
- (f) The potential safety impact of changes in plant or operational complexity, including the relationship of proposed and existing regulatory requirements and staff positions;
- (g) The estimated resource burden on the NRC associated with the proposed action and the availability of resources;
- (h) The potential impact of differences in facility type, design, or age on the relevancy and practicality of the proposed action;

- (i) Whether the proposed action is interim or final, and if interim, the justification for imposing the proposed action on an interim basis;
- (j) How the action should be prioritized and scheduled in light of other ongoing regulatory activities.

Because the guidelines are not backfits, these items are not applicable.

- (viii) For each backfit analyzed pursuant to 10 CFR 50.109(a)(2) (i.e., not adequate protection backfits and not compliance backfits), the proposing Office Director's determination, together with the rationale for the determination based on the consideration of paragraph (i) and (vii) above, that:

- (a) There is a substantial increase in the overall protection of public health and safety or the common defense and security to be derived from the proposal; and
- (b) The direct and indirect costs of implementation, for the facilities affected, are justified in view of this increased protection:

Not applicable.

- (ix) For adequate protection or compliance backfits evaluated pursuant to 10 CFR 50.109(a)(4)

- (a) documents evaluation consisting of:

- (1) the objectives of the modification
- (2) the reasons for the modification
- (3) the basis for invoking the compliance or adequate protection exemption.

- (b) in addition, for actions that were immediately effective (and therefore issued without prior CRGR review as discussed in III.C) the evaluation shall document the safety significance and appropriateness of the action taken and (if applicable) consideration of how costs contributed to selecting the solution among various acceptable alternatives.

Not applicable.

- (x) For each evaluation conducted for proposed relaxations or decreases in current requirements or staff positions, the proposing Office Director's determination, together with the rationale for the determination based on the considerations or paragraphs (i) through (vii) above, that:

- (a) The public health and safety and the common defense and security would be adequately protected if the proposed reduction in

requirements or positions were implemented;

- (b) The cost savings attributed to the action would be substantial enough to justify taking the action.

Though this document does not require licensees to take action, it includes NRC approval of certain portions of later editions of the Code which relax requirements. The licensee may use the approval authorized pursuant to 10 CFR 50.55a(f)(4)(iv) to reduce the number of relief requests that have to be submitted to the NRC for approval, and to use the approval of the Code committee. There are no relaxations other than as approved by the ASME Code, but there are positions that allow licensees to implement the later editions of the ASME Code which delete certain testing requirements which were included in earlier editions. For example, the later Code edition eliminates the recording of inlet pressure for inservice testing of pumps because there were no acceptance criteria in the earlier editions. Costs savings will result if the guidelines are used by a licensee through reduction of submittals to NRC, reduction of NRC staff time to review "generic" relief requests, and possibly precluding shutdown of a plant solely to perform testing. The greatest reduction in relief requests will result from the allowance in the later edition to defer testing of valves to refueling outages if it is impractical to conduct during power operations or cold shutdown outages.

- (xi) For each request for information under 10 CFR 50.54(f) (which is not subject to exception as discussed in III.A) an evaluation that includes at least the following elements:
- (a) A problem statement that describes the need for the information in terms of potential safety benefit.
 - (b) The licensee actions required and the cost to develop a response to the information request.
 - (c) An anticipated schedule for NRC use of the information.
 - (d) A statement affirming that the request does not impose new requirements on the licensee, other than for the requested information.

No request for information under 10 CFR 50.54(f) is included in this generic action. However, if the guidance in the NUREG is utilized to make changes to licensee inservice testing programs, revised relief requests and/or program documents may need to be submitted to the NRC.

- (xii) An assessment of how the proposed action relates to the Commission's Safety Goal Policy Statement.

No impact.

November 16, 1993

MEMORANDUM FOR: Document Control Desk
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FROM: Gail H. Marcus, Chief
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Original signed by Tae J. Kim for
Gail H. Marcus, Chief
Generic Communications Branch
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosures: As Stated

CONTACT: Richard J. Kiessel, NRR
504-2840

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DOCUMENT NAME: memo.3b2

9311170129

Draft Generic Letter

TO: ALL LICENSEES OF OPERATING NUCLEAR POWER PLANTS AND HOLDERS OF CONSTRUCTION PERMITS FOR NUCLEAR POWER PLANTS

SUBJECT: GUIDANCE ON DEVELOPING ACCEPTABLE INSERVICE TESTING PROGRAMS (GENERIC LETTER 89-04, SUPPLEMENT 1)

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Enclosures: As Stated

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NAME	RJKiessel/vsb	GHMarcus <i>GH</i>
DATE	11/16/93 <i>RS</i>	11/16/93 <i>TJK</i>

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Sincerely,

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

Technical contact: Patricia Campbell, NRR
(301)-504-1311

Lead project manager: Jacob Zimmerman, NRR
(301)-504-2426

CRGR REVIEW PACKAGE

PROPOSED ACTION: Issue a draft guidelines document on the development and implementation of inservice testing (IST) programs and nuclear power plants. Following a public comment period from a notice in the Federal Register, the guidelines will be finalized and issued for use.

CATEGORY: 2

RESPONSE TO REQUIREMENTS FOR CONTENT OF PACKAGE SUBMITTED FOR CRGR REVIEW

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Not applicable.

- (ix) For adequate protection or compliance backfits evaluated pursuant to 10 CFR 50.109(a)(4)
 - (a) documents evaluation consisting of:
 - (1) the objectives of the modification
 - (2) the reasons for the modification
 - (3) the basis for invoking the compliance or adequate protection exemption.
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- (x) For each evaluation conducted for proposed relaxations or decreases in current requirements or staff positions, the proposing Office Director's determination, together with the rationale for the determination based on the considerations or paragraphs (i) through (vii) above, that:
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 - (b) The licensee actions required and the cost to develop a response to the information request.
 - (c) An anticipated schedule for NRC use of the information.
 - (d) A statement affirming that the request does not impose new requirements on the licensee, other than for the requested information.

No request for information under 10 CFR 50.54(f) is included in this generic action. However, if the guidance in the NUREG is utilized to make changes to licensee inservice testing programs, revised relief requests and/or program documents may need to be submitted to the NRC.

- (xii) An assessment of how the proposed action relates to the Commission's Safety Goal Policy Statement.

No impact.