



80-555  
#16

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

*Handwritten: 80-555 #16, S. Diab*

AUG 11 1978

MEMORANDUM FOR: G. Arlotto, Acting Assistant Director for General Engineering Standards, DES

FROM: R. Tedesco, Assistant Director for Plant Systems, DSS

SUBJECT: GENERAL ELECTRIC COMMENTS ON REGULATORY GUIDE 1.141

Reference: Letter - G. G. Sherwood to USNRC, same subject, dated June 26, 1978

As you requested, staff members from both the CSB and ICSB have reviewed the comments submitted by the General Electric Company (Reference) on Regulatory Guide 1.141, "Containment Isolation Provisions for Fluid Systems." These comments along with our proposed resolutions are discussed below:

Comments

1. GE contends that the footnotes and appendices in ANSI N271 are not part of the text for this standard and suggest that the Regulatory Guide include a note which highlights this fact. Since the subject footnotes only indicate where additional guidance can be obtained and appropriate disclaimers already appear in the standard for its appendices, we agree with GE that these two areas are not part of the standard. Therefore, we have no technical objection if you incorporate the suggested footnote in Regulatory Guide 1.141.
2. Section 3.3.2(4) of ANSI N27-1975 specifies that automatic isolation valves shall be designed to take the position that provides the greatest safety. GE suggested the Regulatory Guide include the position that when a single active failure is assumed, at least one isolation valve per pipeline shall take the position of greatest safety. The GE rationale, with which we concur, is that the proper isolation of piping when using motor operated valves is achieved by redundancy and single failure considerations, i.e., redundant motor operated valves are provided and are powered from different electrical divisions. Therefore, we recommend that the comment be accepted.

Contact:  
S. Brown, CSB  
492-7711

G. Arlotto

-2-

8/6/78  
Hubert Li  
AUG 11 1978  
Total independence  
i.e. 1E indication independent  
from 1E control circuit

3. GE suggested that the second sentence of Section 4.2.3 of ANSI N271-1976 be modified to read as follows: "The indicating circuit shall be classified IE unless a failure of the indication circuits could not cause a failure of the actuation circuit." (We believe GE intends that the proposed Regulatory Guide be revised to include the above statement). We have reviewed the suggested change and conclude that it should not be adopted. The basis for this conclusion is that the instrumentation for the containment isolation system should satisfy the acceptance criteria for engineered safety feature actuation systems and essential auxiliary support systems, as stated in SRP 7.3.

*R. Tedesco*

Robert L. Tedesco, Assistant Director  
for Plant Systems  
Division of Systems Safety

cc: W. Butler  
R. Satterfield  
J. Shapaker  
S. Brown  
H. Li  
S. Diab

Ray Scholl absolutely  
disagrees with this position.