



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20535

AUG 18 1977

MEMORANDUM FOR: M. Kehnemuyi, Assistant Director  
for General Engineering Standards  
Office of Standards Development

FROM: D. G. Eisenhut, Assistant Director  
for Operational Technology  
Division of Operating Reactors

SUBJECT: COMMENTS ON DRAFT REGULATORY GUIDE 1.XXX,  
CONTAINMENT ISOLATION PROVISIONS FOR FLUID SYSTEMS

In response to your memorandum, dated July 20, 1977, we have reviewed the working paper for Regulatory Guide 1.XXX, "Containment Isolation Provisions for Fluid Systems," Rev. 0, Draft 1, dated July 11, 1977. The draft Regulatory Guide endorses, with two exceptions, ANSI Standard N271-1976. Based on our review, we have developed certain comments which are enclosed.

Subject to the resolution of these comments, we concur with the draft Regulatory Guide.

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ENCLOSURE

DIVISION OF OPERATING REACTORS

COMMENTS ON DRAFT REGULATORY GUIDE 1.XXX

"Containment Isolation Provisions For  
Fluid Systems"

- (1) The implementation section of the draft Regulatory Guide specifies that its requirements will be used in the evaluation of construction permit applications. Operating license applications and operating reactors are not specifically mentioned. Since the OL and OR plants did not have the benefit of guidance from ANSI N271 in the design of their containment isolation systems, we recommend that the implementation section be augmented to specify that the OL and OR plants need not meet the specific provisions of Regulatory Guide 1.XXX, but that its provisions will guide the staff's review and evaluation of OL applications and OR plants.
- (2) Regulatory Position C.1 improperly quotes Section 4.2.3 of ANSI N271-1976. Sealed closed isolation valves are under administrative controls. In the past, the staff has given credit for administrative controls to obviate the need for position or status indication in the control room. On this basis, we believe that the requirement of C.1 should be deleted.
- (3) Neither the draft Regulatory Guide nor the ANSI standard provide design requirements for leak test connections and test vents. Several of the illustrative examples in the appendices to the standard show the test connection in the length of piping between the inboard and outboard containment isolation valves. In this configuration, the test connection becomes a part of the containment boundary. The draft Regulatory Guide should include a regulatory position which provides that test connections located in the piping between either containment isolation valve and the containment wall should be designed to the requirements of Section 3.5 or Section 3.7 and be provided with redundant, diverse methods of closure (e.g., valve and cap) with the appropriate administrative controls.

is current  
practice, even  
on SRP

4.2.3 which  
for specific

4.14 cover  
piping  
between  
isolation  
barriers  
which  
would not  
be test  
connections

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7 for <sup>-2-</sup>single valve outside cont

- (4) Section 3.6.4 of ANSI N271-1976 requires that closed systems outside containment be leak tested unless it can be shown by inspection that system integrity is being maintained. There should be a similar requirement to demonstrate the integrity of closed systems inside containment. How?

cloud system inside container,  
pipe wall as one barrier and  
valve as second



App. I primary leakage of  
water test pressure barrier

~~Cloud system~~

→ Section 3.4 ~~can call for~~ inspection.

3.6.4