



Portland General Electric Company

Bart D. Withers Vice President

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August 17, 1982

Secretary of the Commission
ATTN: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER
PROPOSED RULE

*PR-Misc. Notice
(Reg Guide)*

Dear Sir:

Draft Regulatory Guide on Response Time Testing
of Protection System Instrument Channels (Task IC 121-5)

We have reviewed the subject draft regulatory guide and offer the following comments:

1. The Draft Value/Impact Statement implies that there will be little or no impact on nuclear power plants due to incorporation of this regulatory guide. We have identified numerous potential impacts as compliance with this guide will result in the following:
 - (a) Increased documentation requirements in order to conform with IEEE 388-1977, Section 6.6.
 - (b) Increased manpower requirements and radiation exposures (received during the response time testing) due to the in situ testing requirements.
 - (c) Increased testing method requirements due to the following:
 - (i) testing methods would include impulse lines.
 - (ii) ramp and step input signal testing would be required in addition to the noise analysis techniques currently in use.
 - (d) Increased documentation due to the requirement for an evaluation of the effect on response time every time a transmitter is found to be out of calibration.

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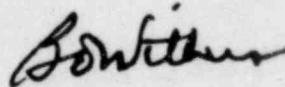
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- (e) A possible increase in testing since an evaluation of the current frequency of testing would have to be performed and documented per the requirements of the draft standard.
- (f) Increased documentation and equipment expenditures to perform an evaluation to compare the present testing method with an accepted "direct" method in order to justify its continued use on a limited basis.
- (g) Increased testing and documentation may be required to verify the acceptability of the test equipment currently in use.

The Draft Value/Impact Statement should be revised to include these impacts and provide corresponding justifications in the value section of the Draft Value/Impact Statement.

2. The implementation section of this guide should be clarified to state whether or not backfitting is intended for existing plants. If backfitting is intended, the Draft Value/Impact Statement should be revised accordingly.

Sincerely,



Bart D. Withers
Vice President
Nuclear

Attachment