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Chief, Rules Review and Directives Branch
Division of Freedom of Information and Publications Services
Mail Stop P-223
U. S. Nuclear Regulatory Commission
Washington, DC 20555

- References: 1. Docket No. 50-285
- 2. Federal Register, Volume 58, No. 240 dated Thursday, December 16, 1993

Dear Sir:

SUBJECT: Comments from Omaha Public Power District (OPPD) on Reference 2

In Reference 2, the NRC solicited comments for a proposed generic letter (GL) supplement that, when issued, will forward NUREG-1482, "Guidelines for Inservice Testing Programs at Nuclear Power Plants," which provides NRC recommendations for a number of generic issues concerning the implementation and development of inservice testing (IST) programs.

OPPD has the following comments regarding the draft NUREG-1482:

- 1) The draft GL guidelines state several times that, although the requirements are as stated in the ASME Operations and Maintenance (O&M) Standards Manual and the licensee is complying with the Code, "if a licensee chooses to implement this guidance, this section (of the guidelines) must be explicitly referenced in the IST program." Examples of this requirement are contained in Section 3.1.1.1 (page 3-2), Section 3.1.1.2 (page 3-3), and several other places throughout the NUREG.

The licensee should not have to state in the IST Program the methods of ensuring Code compliance, if the licensee is complying with the Code.

- 2) The NRC Recommendation in Section 4.1.2 (page 4-3) states in part "...the NRC determined that the use of non-intrusive techniques is acceptable to verify the full stroke of a check valve, although the flow rate must be sufficient to stroke the valve to the backstop." Later in the section the NRC alludes to "non-intrusive techniques" as techniques to verify that the system pressures and flow conditions specified in the

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test procedures cause the valves to fully stroke (i.e., pressure/flow instruments are non-intrusive techniques).

The NRC appears to be requiring the valve be opened to the backstop in order to meet the guidance in Position 1 of GL 89-04. As stated in GL 89-04, Position 1, page A-2, "a check valve's full-stroke to the open position may be verified by passing the maximum required accident condition flow through the valve. This is considered by the staff as an acceptable full stroke." It appears that in Section 4.1.2 of the draft, the NRC is presenting an additional condition for check valve full-stroke verification, that is, to require that the valve be opened "sufficient to stroke the valve to the backstop." OPPD considers this additional requirement to be unnecessary and, for certain types of check valves, not possible or practical to implement.

- 3) The NRC Recommendation in Section 4.2.1 (page 4-5) states in part "...OM-10 requires corrective action if a limiting stroke time is exceeded and does not allow for an increased test frequency." It is OPPD's understanding that while OM-10 does not specifically state that frequency shall be increased, neither does OM-10 prohibit an increase in test frequency as stated in Section 4.2.1.9, OM-10, Part 10. At Fort Calhoun Station (FCS), the increase in test frequency may be done as an additional corrective action or as a temporary corrective action. OPPD interprets this section to be applicable to those times when testing frequency is not able to be increased due to plant conditions (i.e., plant is operating).
- 4) The Basis for Recommendation in Section 4.2.7 (page 4-10) refers to Figure 4.2 being a sample relief request for the use of stroke time reference. The location of Figure 4.2 is not apparent.
- 5) The NRC Recommendation in Section 4.3.3 (page 4-12) endorses two alternatives to qualification requirements as stated in PTC-25.3-1976. Alternative (1) notes that if OM-1 requirements are used, criteria established for qualifying the test supervisor must be documented in the test implementation procedure or work package, and documentation that the test supervisor meets the qualifications must be available in the test records. OPPD uses personnel qualified per requirements of the FCS QA Program, and believes compliance with OM-1 and the QA program is sufficient. Documenting qualifications in the test procedures or packages when that documentation already exists in the QA Program and personnel training and qualification records is necessary.
- 6) Section 4.4.2 (page 4-17) notes that containment isolation valves included in the Post Accident Sampling System (PASS) components are required to be included in the IST Program. The basis for including this as a separate section of the draft is not clear, since containment isolation valves in any system should come under the test requirements of Appendix J and/or the IST Program.

- 7) Section 4.4.6 (page 4-21) clarifies that exercise requirements for manual valves be "...in accord with applicable IST requirements of IWW or OM-10 if the manual valve is credited in the safety analysis for being capable of being repositioned to shut down the plant, to maintain the plant in a safe shutdown condition, or to mitigate the consequences of an accident." However, no direction or relief action is given.

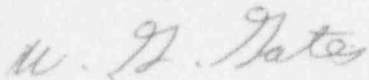
OPPD requests that the NRC provide additional guidance on relief actions/frequency justifications (e.g., stroke time not required on manual valves and valve position verification for manual valves).

- 8) In Section 5.4 (page 5-6) the NRC discusses pump vibration monitoring and the various changes from IWP to OM-6. However, the vibration acceptance criteria in OM-6 are not clearly stated, (i.e., $2V_R$ to $6V_R$ $<.325 >.7$), nor is it clear if these values are for full flow testing or minimum flow testing, where vibration levels typically increase due to flow noise.
- 9) In Section 5.5, pages 5-7 and 5-8, instrumentation range and accuracy is discussed using both analog and digital instrumentation. It is unclear whether computer points or printouts can be used to meet the necessary instrumentation requirements and if additional requirements are associated with the use of the computer.
- 10) Section 5.7.2.12 of the revised standard technical specifications (page 6-3) discusses test frequencies and surveillance requirements for IST. Tolerances/grace periods such as $\pm 25\%$ of due date should be specified. Any tolerance that is applicable during "increased frequencies" should be stated.
- 11) The third paragraph of Section 7, page 7-1, discusses noncompliance with 10 CFR 50.55a (Code) requirements. OPPD suggests adding guidance in this section to address certain other additions of components to a plant IST program, e.g., when the components formerly did not clearly fall within the scope of Code requirements, but the licensee has elected to add the component to the IST program because of a modification, revised interpretation, or philosophy change. For program additions in this category, engineering analysis and other types of testing could be used in lieu of Section XI testing to justify operability of the components before addition to the IST program; subsequently, operability would be determined through normally scheduled testing. In other words, the licensee should be able to assume operability for certain categories of components newly added to the IST without invoking the guidance in GL 91-18 for a grace period until the next scheduled IST program testing is completed.

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Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "W. G. Gates".

W. G. Gates
Vice President

WGG/mah

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