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March 3, 1994

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Review of Draft NUREG-1482 "Guidelines for Inservice Testing at Nuclear Power Plants"

The Illinois Department of Nuclear Safety (IDNS) hereby submits its comments on Draft NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," published in the Federal Register, Volume 57, Number 162, dated August 20, 1992. IDNS, under Subagreement 2 between the U.S. Nuclear Regulatory Commission and the Illinois Department of Nuclear Safety, participates in joint inspections of inservice testing (IST) programs with Region III inspectors. IDNS believes that NUREG-1482 represents a very important step forward in defining the NRC's expectations of the content and conduct of the IST program. In regard to draft NUREG-1482, IDNS has the following comments.

Section 2.2, "Criteria for Selecting Pumps and Valves for the IST Program," should include a discussion of valves which may be required to close to prevent exceeding the 10 CFR 100 off-site release limits. It should be pointed out that each valve that closes automatically as a result of radiation readings should be examined to see whether the failure of the valve to close could lead to exceeding the 10 CFR 100 limits. It should also be pointed out that if the fluid involved is a liquid which will not flash to steam, the likelihood of exceeding the 10 CFR 100 limits is remote.

Table 2.1, in several places, refers to "pump and discharge check valves." This statement should be modified to include suction check valves, as these valves are required to be operable in order for the pump to function.

Table 2.1, Page 2-12, "Typical components ..." for the Service water system should include "valves in flowpath to component cooling water." The component cooling water system is often required to cool safety-related loads, e.g., RHR heat exchanger.

Section 4.2.5, Verification of Remote Position Indication for Valves by Methods Other Than Direct Observation, discusses the actions which need to be taken if valve position cannot be verified by local observation. It should be pointed out that, for certain types of valves, for example, wedge disk gate valves, direct observation of the valve stem may not provide assurance that the valve disk is attached to the stem. In these cases, the NRC should

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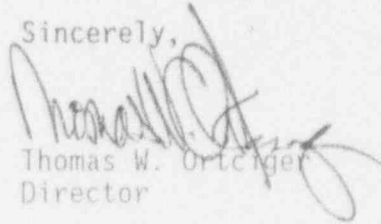


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recommend that other positive means be used to supplement the local observation.

The NRC Recommendation for Section 4.4.4, Post-Maintenance Testing following valve stem packing adjustment, needs to be revised. As written, it is not clear that an engineering evaluation must be performed in all cases, not just in those cases where the torque value is in excess of the manufacturer's limit. It should also be clarified that if the torque exceeds the manufacturer's limit, an analysis by the manufacturer must be performed as part of the engineering analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas W. Ortoger", is written over the typed name and title.

Thomas W. Ortoger  
Director

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