ENTERGY

Entergy Operations, Inc.
P.O. Box 31995
Jackson, MS 39286-1995
Telephone 601 368 5758

Jerrold G. Dewease
Director
Licensing Services

OFFICE OF ADMINISTRATION USNRC

'94 MAR 15 P2:08

DS09

10069
R. Kiessel
58FR95738
12/16/93
(9)

March 14, 1994

Mr. David L. Meyer, Chief,
Rules, Directives and Review Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Entergy Operations, Inc. Comments on Proposed Supplement 1 to Generic letter 89-04, Draft NUREG-1482

Reference: Federal Register Volume 58, 95738, dated December 16, 1993

CNRO-94/00007

Dear Sir:

The referenced Federal Register listing invited comments on draft NUREG-1482. Entergy Operations, Inc., the licensee for Arkansas Nuclear One, Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station has reviewed the proposed rule change and offers the attached comments for your consideration.

In addition to our specific comments, Entergy Operations, Inc. reviewed and concurs in general with the comments submitted by the Nuclear Management and Resources Council (NUMARC) in regard to this draft NUREG.

We appreciate the opportunity to provide our comment on the draft NUREG.

Sincerely,

for

JGD/jkw
attachment
cc: (next page)

cc: Mr. T. W. Alexion
Mr. R. H. Bernhard
Mr. R. P. Barkhurst
Mr. R. B. Bevan, Jr.
Mr. L. J. Callan
Mr. J. F. Colvin
Mr. S. D. Ebneter
Mr. E. J. Ford
Mr. C. R. Hutchinson
Mr. J. R. McGaha
Mr. P. W. O'Connor
Mr. N. S. Reynolds
Mr. R. G. Schaaf
Ms. L. J. Smith
Mr. W. F. Smith
Mr. H. L. Thomas
Mr. D. L. Wigginton
Mr. J. W. Yelverton
Corporate File [ ]
DCC (ANO)
Records Center (W-3)
Central File (GGNS)

Entergy Operations Comments on
Proposed Supplement 1 to Generic letter 89-04, Draft NUREG-1482

General

NUREG 1482 was written to assist the nuclear industry in eliminating unnecessary requests for relief and to give approval of an alternative method of inservice testing if that method is in accordance with the latest edition of industry Codes and Standards approved per the requirements of 10CFR50.55a.

The draft NUREG indicates that documenting use of the new guidance in the IST program is sufficient for certain circumstances. However, in the past some licensees have been directed to submit plant specific relief requests for items preapproved by GL 89-04.

Section 1

Section 1, pg 1-2

It appears from the second paragraph of this section that the staff will utilize the NUREG guidance as a basis for granting relief even if a relief request was not written utilizing the NUREG. If this is the intent, then a backfit analysis should be required since this additional guidance, which may be more restrictive than 10CFR50.55a or the ASME Code, would then become a defacto regulatory requirement.

Section 2

Section 2.1, Page 2-1

In the second paragraph, the Staff states that it is a requirement to receive NRC approval to use portions of later editions and addenda of the ASME Code and receive that approval prior to performing or conducting specific tests.

The wording of this requirement should be consistent with the wording of 10CFR50.55a.

If formal approval is required prior to implementation the regulation should so state. Entergy in the past, has performed testing to later editions and addenda which were approved by the Commission and contained in 10CFR50.55a(b) by notification of the intended use of an already approved regulation.

Section 2.1, pg 2-2

The third paragraph states, "The NRC may authorize alternatives to the ASME Code testing requirements submitted as relief requests."

10CFR50.55a(a)(3) does not specify that an alternative be requested as a relief request. It is recommended to delete the last four words of the sentence to be consistent with 10CFR50.55a.

Section 2.1, pg 2-2

In the first bullet, reasons stated for NRC approval of alternatives appears overly narrow. The NRC should also approve alternatives when a licensee has shown that a reduction or deletion of testing will still provide an acceptable level of quality and safety. Additionally, proposed alternatives should not need to comply with any ASME Code edition if the alternative will not reduce the level of quality and safety.

Section 2.2, Page 2-3

The first paragraph and also paragraph 4.3.1, page 4-11 states that the 1986 edition of Section XI expands the scope of IWV to include valves which give overpressure protection to safety-related ASME Code class systems, subsystems and components. The scope of the OM Standards and ASME Code has been expanded to include all safety-related pumps and valves in the IST program.(The scope of OM Standards would also include relief valves required for overpressure protection.)

Pressure relief devices which are installed in the applicable systems to protect against overpressure may not typically perform a safety-related function. However, these valves are now required to be in the IST Program and tested. Entergy's position is that pressure relief devices whose sole function is to provide overpressure protection and that do not provide a specific function in accident mitigation, reactor shutdown, etc. should not be included in the IST Program. This position is consistent with OM-1 Interpretation 1-2 for Class 2 and 3 pressure relief devices.

Section 2.4.4, pg 2-7

This section appears to request that the voluntary IST program bases document be treated as a licensing basis document and reviewed for 10CFR50.59 evaluations. Since this document is not submitted for approval by the NRC, or even required, it is not appropriate to place this level of importance on the bases document. Usually, this is a compendium of information obtained from other controlled plant documents that are used

as a licensing bases and would be subject to the requirements of 10CFR50.59. It is suggested that the subject sentence in this section of the NUREG be modified as follows: "This document is considered a useful reference for reviews performed when changes to a facility are made."

Section 3

Section 3.3.1, pg 3-10

The first paragraph indicates that intervals may be extended only because of an extended outage and that the licensee must request approval of the extension. The reason for requesting an extension for up to one year is not specified in the regulations or the ASME Code. Additionally, neither the ASME Code nor 10CFR50.55a requires a request for approval or even notification to the NRC, for an interval extension of up to one year.

Section 3.3.2, Example on pg 3-12

It is unlikely that any licensee would utilize such an interval schedule for concurrent intervals since it increases the total number of program updates required by each unit.

Section 4

Section 4.1.1, Page 4-2

The first paragraph, last sentence requires that if the pair of valves fails the IST, both must be declared inoperable and be repaired or replaced prior to return to service.

The wording of this sentence should require that only the affected valve or valves be repaired or replaced and not imply that it is mandatory to repair or replace both valves.

Section 4.2.6, Page 4-9

Though not specifically required by the ASME Code, the Staff is recommending that the position indication for both positions of a valve be verified, even if the valve has only one safety position. The Staff also is recommending that the remote locations that include position indication for operators for use in an accident condition, or in cycling the valve to the safe position, be verified on a periodic basis.

This recommendation exceeds requirements specifically addressed by the OM Code and clarified by ASME Code Interpretation XI-1-89-10. If applied, this would impose additional testing requirements that have not been reviewed for backfit considerations.

Section 4.2.7, pg 4-9

The recommendation section implies that licensees must utilize OM-10 if they use reference values to measure changes in stroke times. This is not the case, licensees may continue to use IWV-3413 along with the guidance originally provided in GL 89-04.

Section 4.3.8, pg 4-15

This section infers that licensees must use OM-1. If a licensee is required to use only IWV, then OM-1 is not applicable for vacuum relief valves and their requirements.

Section 5

Section 5.5.1, pg 5-7

It would appear that installation or replacement of instruments to meet new ASME Code requirements should be considered under the requirements of the backfit rule. This also refers to the staff position for Question Group 105.

Section 5.5.2, pg 5-8

A licensee may utilize IWP and not OM-6. In this case, if a licensee chooses to use digital equipment for which IWP does not have requirements, may the licensee develop its own internal guidance for use without a request for relief?

Section 6

Section 6.3, pg 6-4

The approvals needed to implement a relief request prior to NRC approval should be revised to "approval by the plant staff according to plant administrative policies." The general term "plant administrative policies" is broad enough to include a plant safety committee review and a 10CFR50.59 review. The amount and levels of review necessary should be left to the licensee's discretion and not dictated by a voluntary NUREG.

Appendix A

Question Group 13

The Current Considerations section does not appear to be related to the question.

Question Group 27

The precursor "Although not required by 10CFR50.55a or the ASME Code to be included in the IST program, the staff recommends..." should be added to the sentence in the Current Considerations section.

Question Group 33

The Current Considerations section should be clarified, the multipliers need be in accordance with OM-10 or relief requested, only if the licensee's IST program is conducted to OM-10. Otherwise the original guidance to have the justification available on site is still valid.