

DS09

R. Kiesel

Station Support Department

10



PECO ENERGY

USNRC
OFFICE OF ADMINISTRATION

PECO Energy Company
Nuclear Group Headquarters
985 Chesterbrook Boulevard
Wayne, PA 19087-6691

'94 MAR 16 P2:13
54 FR 65738

March 10, 1994

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

Subject: PECO Energy Company
Comments Concerning Proposed Supplement 1 to
Generic Letter 89-04, "Guidance on Developing
Acceptable Inservice Testing Programs" (58FR65738)

Dear Mr. Meyer:

This letter is being submitted in response to the NRC's request for comments regarding the proposed Supplement 1 to Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," published in the Federal Register (i.e., 58FR65738, dated December 16, 1993). This proposed GL supplement forwards draft NUREG-1482, "Guidelines for Inservice Testing Programs at Nuclear Power Plants," which provides NRC guidance and recommendations regarding the development and implementation of Inservice Testing (IST) programs at nuclear power plants. PECO Energy Company appreciates the opportunity to comment on this proposed GL supplement and associated draft NUREG-1482 and offers the following comments for consideration by the NRC. In addition, we fully endorse the position and comments submitted by the Nuclear Management and Resources Council (NUMARC) regarding this proposed GL supplement.

Comments

1. Section 3.4, "Skid-Mounted Components and Component Assemblies"
 - We request that the NRC clarify when the Operations and Maintenance (OM) codes and standards for addressing the scope of skid-mounted components and component subassemblies are to be included in the IST programs. In addition, we request clarification as to whether this scoping is intended to address skid-mounted components beyond those listed in the first paragraph of Section 3.4.

2. Section 4.3.4, "Frequency and Method of Testing Automatic Depressurization Valves in Boiling-Water Reactors"
 - The NRC has indicated that the use of acoustic monitoring techniques is an acceptable method for measuring stroke times on Automatic Depressurization System (ADS) valves as long as a 2-second limiting value is assigned for these valves. Based on the results of acoustic monitoring measurements obtained during stroke time testing of our ADS valves, we have identified a variation in

290001

9403300012 940310
PDR I&E
MISC PDR

valve stroke times in the range of 1.4 to 2.2 seconds. Therefore, as a result of these findings, we do not consider the 2-second stroke time limit reasonable when using acoustic monitoring techniques and recommend that the NRC consider increasing the 2-second limiting stroke time value for the ADS valves.

3. Section 4.4.3, "Multiple Containment Isolation Valve Leak-Rate Testing" and Section 5.3, "Allowable Variance from Reference Points"

- These sections provide details regarding methodology to be included in the IST programs. We request that the NRC clarify whether this methodology can be included in a plant's administrative procedures governing the IST program or in surveillance test procedures.

4. Section 5.2, "Use of Variable Reference Values for Flow Rate and Differential Pressure During Pump Testing"

- This section provides guidance relative to the use of pump curves for establishing reference values for flow rate and differential pressure if the licensee can clearly demonstrate in a relief request the impracticality of establishing a fixed set of reference values. The example used in this section for an "acceptable test plan" references an acceptable pump operating range of 0.93 - 1.02 times the pump curve value. This range was based on the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code, Section XI, Subsection IWP requirements. In addition, the NRC indicates that the requirements of OM-6 can be used for establishing allowable operating ranges for pumps. Therefore, if the requirements of OM-6 are to be used for establishing pump operating ranges, we request that the NRC clarify whether the OM range of 0.9 - 1.1 times the pump curve value should be used for determining an acceptable pump operating range.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

G.A. Hunger, Jr.

G. A. Hunger, Jr.
Director
Licensing Section