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Building 130

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Chief, Rules Review and Directives Branch
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Mail Stop P-223
U.S. Nuclear Regulatory Commission
Washington, MD 20555

USNRC
OFFICE OF THE DIRECTOR
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Dear Sir or Madam:

Please find attached additional comments on draft NUREG-1482. This is in addition to the comments submitted March 1, 1994. If you have any questions regarding our comments, please contact either myself or Mr. Edward Grove at 516-282-5558.

Sincerely yours,

Adele DiBiasio
Engineering and Testing Group
Engineering Technology Division

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Attachments

cc: P. L. Campbell, USNRC, NRR
J. Taylor
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BNL's Comments on Draft NUREG-1482

- The Staff should clarify the use of root-mean-square (rms) vibration readings in Section 5.4.

Section XI, prior to the 1988 Addenda, required that vibration be 'read' in peak-to-peak. This could be interpreted to mean that it is acceptable to measure rms, convert it to peak-to-peak, and read it as peak-to-peak. OM Part 6 removed this ambiguity and requires vibration to be measured in peak or peak-to-peak. Newer digital equipment now measures directly in peak. The NRC mandated ten-year update of the ISI and IST programs reflects the need for licensees to incorporate new technologies incorporated into the Codes. However, there is continuing debate within the Code committees on whether the use of rms measurements is acceptable for determining the operational readiness of pumps. A Code inquiry has recently been answered by ASME (File OMI 94-2) which explains that the intent of the OM Code is to allow vibration to be measured in rms and mathematically converted to peak readings. Readers should be made aware that the Code vibration acceptance criteria is in peak or peak-to-peak units and the use of rms, without a mathematical conversion, is not acceptable.

- The NUREG should clarify the grouping of check valves for disassembly and inspection and non-intrusives testing. Some utilities have grouped valves from different units. In accordance with Section 4.1.2 and Position 2, if there is a problem with the sample valve, all the valves must be tested during the same outage. The NUREG should clarify what actions are required if the grouping includes valves from different units. Should the other unit(s) be shutdown immediately to examine the remaining valves in the group or can the examination be deferred until the next refueling outage?

- The NRC should provide a stronger recommendation on the use on non-intrusive testing over disassembly and inspection, and the potential benefits that could be realized by the utilities. There should be some incentive for performing this testing. In the Current Considerations found on page A-5, the Staff provides some direction, albeit weak.