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April 25, 1994

FAX TO: Mr. Herman L. Graves FAX No. 301-492-3696
Nuclear Regulatory Commission

FROM: Sandy Lee, PM FAX No. 408-374-4113
VSL Nuclr Branch Mgr

SUBJECT: Proposed Rule Change for Inservice Inspection Program

VSL would like to provide the following comments for consideration as a reflection of practical application of the proposed rule change to ISI as currently drafted:

1. Section 55.55a(b)(2)(ix)(A) page 983

This rule change requiring inspection of all grease cans cannot in all cases be implemented since there are some plants (e.g., San Onofre) that were designed so that not all tendons can be detensioned. In later years this design approach was changed; however, the rule change should take into account those situations where the original design of the post-tensioning was such that all of the tendons were never meant to be detensionable.

2. IWL-2320

This rule change requires that the surveillance contractor provide a Registered Professional Engineer on site training inspectors, evaluating the surveillance, etc. VSL has been actively engaged in surveillance work as well as new construction in Asia and relies quite heavily on our experienced personnel, several of whom are not Registered Professional Engineers. Nuclear surveillance work is a specialized business where experience is critical and governs. We have found that it is possible to have our registered professional engineer at the office review pertinent documents, etc. and provide evaluation for these, while the field personnel have the expertise required to evaluate the actual surveillance operations.

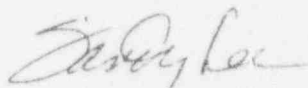
Secondly, the proposed rule change does not clarify where the professional engineer is to be registered. If the engineer is to be registered in the state where the work occurs, then the surveillance contractor may not be able to provide this personnel without incurring additional expense that is subsequently passed on to the utility.

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Thank you for this opportunity to provide our comments to the proposed rule change.

Best regards,



Sandy Lee, Ph.D.
Nuclear Branch Manager

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cc: Mr. Larry Krauser, VSL V.P.
Mr. Dave Swanson, VSL QAPM