



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

*Fax to
Cordell
Williams*

Docket No. 50-329/330

OCT 1 1981

MEMORANDUM FOR: C. C. Williams, Chief, Plant Systems Section, Region III
FROM: J. B. Henderson, Senior Reactor Projects Engineer, Reactor
Projects Section (RI & III), RPRIB, DRRRI, IE
SUBJECT: JURISDICTION OVER INSTRUMENT SENSING LINES

Footnote 2 to 10 CFR 50.55a exempts small lines such as instrument sensing lines from the requirements of Section III. The lines serve no fluid system purpose, experience no normal system flow, and exist only as part of the pressure (or differential pressure) sensing system. For these reasons, we believe that they properly fall under the scope of IEEE 279.

We note that the licensee is taking the position that 279 jurisdiction starts with the transmitter. We believe that the jurisdiction starts at the sensing line connection to the process piping, and includes the full length of the sensing lines, the sensor and any signal conditioning devices as well as the transmitter.

Aside from jurisdictional matters, we also believe that common prudence would dictate identification.

Jim

James B. Henderson
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