



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

OCT 16 1991

COPY FOR:
VAGINS & MILLMAN
ACTION

This one is important
and needs attention

10/17

PDR

ADOS-2

006

MEMORANDUM FOR: Robert J. Bosnak, Deputy Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Warren Minners, Director
Division of Safety Issue Resolution
Office of Nuclear Regulatory Research

SUBJECT: DIVISION REVIEW OF FINAL RULE FOR 10 CFR 50.55A:
UPDATE REFERENCES TO ASME CODE AND IMPOSE AUGMENTED
REACTOR VESSEL EXAMINATION

Reference: September 24, 1991 to various NRC Division Directors.

As requested, DSIR has reviewed the referenced memorandum and its attachments i.e., proposed revisions to 10 CFR 50.55a and the supporting rulemaking package.

DSIR has one significant comment:

Enclosure 1, p. 1-18, first paragraph and Item 4 "Resolution," p. 2-18
Both of the referenced paragraphs contain discussions about the scope of pump and valve inservice testing as currently specified in 10 CFR 50.55a and indicate that the proposed rulemaking is not intended to expand the scope beyond what is currently addressed in 50.55a. The referenced paragraphs state that both the current 50.55a and the proposed amendment provides requirements only for the inservice testing of pumps and valves "classified" as ASME Code Class (CL) 1, 2, and 3.

DSIR does not believe this is a sufficiently complete description of the scope of pump and valve testing as required in the current 50.55a. Many older plants were designed and constructed before the ASME Code contained design requirements for CL 1, 2, and 3 pumps and valves. Thus, if 50.55a only contains ISI/IST requirements for pumps and valves "classified" as CL 1, 2, and 3, the regulations would exempt all safety related pumps and valves in older plants from inservice inspection and testing.

However, DSIR notes that this formal classification concern is addressed in 10 CFR 50.55a(g)(1) applicable for plants whose Construction Permits were issued prior to January 1, 1971, which requires that, to the extent practical, components meet requirements for inservice examination and inservice testing that are applicable to components which are classified as ASME Code Class 1, 2, and 3.

OCT 16 1991

Robert J. Bosnak

- 2 -

The exact words from 10 CFR 50.55a(g)(1) are:

"Components which are part of the reactor coolant pressure boundary and their supports shall meet the requirements applicable to components which are classified as ASME Code Class 1. Other safety-related pressure vessels, piping, pumps and valves shall meet the requirements applicable to components which are classified as ASME Code Class 2 or Class 3." (Emphasis added).

DSIR recommends that the discussion in the referenced paragraphs on pp. 1-18 and 2-18 (and also the bottom of page 1-17) of the proposed rulemaking package be revised to remove the implication that the current regulations do not require inservice testing of pre-Section III safety related pumps and valves. Instead, it should be noted that these components are to be inservice tested in accordance with Section XI IWP and IWV requirements applicable to pumps and valves classified as Code Class 1, 2, or 3 as required by 10 CFR 50.55a(g)(1).

DSIR has no comments on the balance of the referenced package.



Warren Minners, Director
Division of Safety Issue Resolution
Office of Nuclear Regulatory Research

cc: T. King
M. Vagins
G. Millman
R. Baer
F. Cherny
J. Page
J. Norberg
E. Sullivan