

**From:** Peter Tam  
**To:** Crane, Randy; Michael Junge; Scarpello, Michael; Vasey, Bob  
**Date:** 2/27/06 2:21PM  
**Subject:** Cook - Draft RAI on Pump and Valve Relief Requests (TAC MC9455 and MC9456)

Bob:

We are reviewing your 12/28/2005 request for relief for pumps and valves for the 4th interval. Our reviewer Michael Junge has the following draft RAI that we would like to discuss with you in a conference call:

1. Relief request REL-001

RAI REL-001-01

ISTC-3560 requires valves with fail-safe-actuators to be tested by observing the operation of the actuator upon loss of valve actuating power in accordance with the exercising frequency of ISTC-3510. Please provide information as to why fail-safe testing of these valves during a refueling outage as required by the ASME Code is impractical.

2. Relief request REL-002

RAI REL-002-01

The basis for relief identifies an NRC document titled "Summary of October 9, 1997, Meeting on RWST Mini-Flow Recirculation Line Valve Testing." This document describes an agreement in which it would be appropriate that the valves be added to the licensee's in-service test program as Category B valves. As Category B valves, the Code does not require individual valve leakage testing. For Category B valves, the only requirement is for closure exercising and system leakage testing. Under those circumstances, the reverse flow testing is acceptable. Please provide information as to the change to the valve categorization back to category A, and how reverse testing is an acceptable alternative.

3. Relief Request PP-2

NUREG-1482, Revision 1, Section 5.4 discusses Monitoring Pump Vibration in accordance with ISTB. The basis section discusses the speed range to be evaluated. Instruments with a frequency response that meets these requirements for slow-speed pumps may not be widely used. However, the unavailability of instruments alone does not constitute adequate justification for obtaining relief or approval of an alternative; however it may be a significant element in the justification. The NRC has observed that because of technology advancement and research in the field of instrumentation and vibration measuring transducers, meeting code requirements can now be procured from various suppliers at reasonable costs. Please provide a discussion as to the availability of instruments to measure the lower frequency necessary to meet the code requirements.

4. Relief Request PP-3

RAI PP-3-001

The reference used in this Request for Relief, NUREG-1482, Revision 1, Section 5.5.1 discusses the range and accuracy of analog instruments. The basis describes the justification for using originally installed gauges with instrument ranges of 4 times the reference value. Please provide a basis for using the 0-600 psig gauge to establish the reference value for suction pressure of the Residual Heat Removal Pumps (lowest reference value (23.2 psi). Additionally, provide a discussion on the feasibility of using temporary gauges for these pressure test gauges.

The sole purpose of this e-mail is to prepare you and others for the proposed conference call.  
**This e-mail does not formally request for additional information, nor does it convey a formal NRC staff position.**

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