



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

John Stone
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SSINS 6025

MEMORANDUM FOR: S. E. Bryan, Division of Reactor Operations Inspection,
Office of Inspection and Enforcement

FROM: R. C. Lewis, Acting Chief, Reactor Operations and Nuclear
Support Branch, Region II

SUBJECT: OPERABILITY REQUIREMENTS (AITS No. P02700028)

A concern was recently identified involving the starting point for time periods in Technical Specification ACTION statements when equipment has been declared inoperable under the ASME Section XI testing program.

ASME Section XI, IWP-3220, states "All test data shall be analyzed within 96 hours after completion of a test". IWP-3230(c) states, in part, "If the deviations fall within the 'Required Action Range' of Table IWP-3100-2, the pump shall be declared inoperative,"

In most cases equipment covered by ASME Section XI, IWP, is also covered by Technical Specifications and, if declared inoperative, would result in the plant entering an ACTION statement. These ACTION statements generally have a time period after which, if the equipment is still inoperative, the plant must perform some specific action (shutdown, cool down, etc.).

The concern arises in the area of the aforementioned data analysis interval versus the Technical Specification ACTION statement time period. It is questionable whether or not these periods run consecutively, concurrently or otherwise. The enclosed scenario's detail likely plant events and are indicative of actual experience.

Region II believes that a reasonable time for data analysis is not more than two shifts (16 hours) except in extreme circumstances. The Technical Specification ACTION time should start immediately after the data has been reviewed by the cognizant supervisor (shift supervisor, foreman, etc.). Licensee procedures must require prompt review by the cognizant supervisor when test results fall outside acceptance criteria.

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We do not believe that ASME Section XI statement on evaluation of test data relieves the licensee of action statements in Technical Specifications. We request that this matter be reviewed and our understanding be confirmed or guidance issued to provide uniformity.

HC Davis /fr

R. C. Lewis, Acting Chief
Reactor Operations and Nuclear
Support Branch

Enclosure: Field Experience Regarding
Equipment Operability

ENCLOSURE

FIELD EXPERIENCES REGARDING EQUIPMENT OPERABILITY

1. A Section XI test is run on an engineered safety feature pump on Saturday morning and the data fall on the lowest limit of the "Required Action Range" just above the "Alert Range". The plant Performance Engineer, who performs the data review and would be the individual to declare the pump inoperative, is not on site until Monday morning when the data set is reviewed.

On Monday, the Performance Engineer reviews the data and declares the pump inoperable per the Technical Specifications and thus "starts the clock" on the ACTION statement time period.

Most Licensees would view this as acceptable due to the 96-hour statement included in IWP.

2. A safety-related pump is tested and the data fall within the "Required Action Range". The Performance Engineer orders that the instruments be recalibrated (24-36 hours) and the test re-run as allowed by IWP-3230(b). The test is re-run and the data are still in the "Required Action Range". The Performance Engineer declares the pump inoperable and "starts the clock".

This might be done in order to extend operation until a scheduled outage.

3. A safety-related pump is tested and the shift supervisor notes that the data appears to fall into the "Required Action Range"; however, he feels it should be further analyzed. The data are transmitted to the Performance Engineer who waits 2-3 days to make his analysis and then declares the pump inoperable thus "starting the clock" (at this point he could also request the test be re-run, adding more time to the cycle).

This also might be done to extend operations until a scheduled outage or to delay plant shutdown until the weekend.