



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

FEB 25 1985

MEMORANDUM FOR: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

FROM: Victor Stello, Jr.
Deputy Executive Director
Regional Operations and Generic Requirements

SUBJECT: GENERIC TECHNICAL SPECIFICATIONS REGARDING ACCEPTABLE
PRESSURE ISOLATION VALVE (PIV) IN-SERVICE TEST LEAK RATES

I have reviewed the subject package you transmitted by your February 14, 1985 memorandum and believe this matter should be reviewed by CRGR.

Your proposed relaxation of the PIV leak rate acceptance criteria at licensee's option appears to be a step in the right direction to reduce unnecessarily stringent requirements that increase occupational exposure but only have a small safety benefit. Review of contractor information transmitted by your memorandum highlights the fact that significant variation and confusion remains among licensees as to what PIVs require leak rate testing and the attendant safety rationale. While this latter issue is separable from the issue of unnecessarily stringent leak rate acceptance criteria, it should be promptly addressed.

It appears that some of the more recent licensees may have been required to provide for a significant increase in the number of PIVs to be periodically tested throughout their lifetime relative to other licensees. As a result, the PIV tests and attendant repairs are often cited as a critical-path item on return to power after an outage. One licensee reports an average exposure of 1.3 rem/valve was experienced (total of 8 rem accumulated for six valves) in achieving the staff's leak rate criteria applied to the PIVs in their plant. What is surprising in the instance of this licensee is that many of the valves he is being required to test are in full design pressure systems such as the charging system, which is subject to continued use during plant operations with considerable valve redundancy and capability of being isolated. On the other hand, this same licensee is not being required to conduct PIV tests on systems (such as the accumulator and upper head injection (UHI) systems) that are currently being required of a number of other licensees who conversely do not have to test valves in the charging system. The safety rationale for these variables is not evident, yet the PIV testing of the accumulator and UHI valves nearly doubles the number of valves the staff is requiring to be included in certain licensees' technical specifications. As an example, significant PIV back leakage in the W accumulator system is detectable and this leakage could be isolated on detection. The LCO on operability of the accumulator system would likely control the time such PIV deficiencies could exist under isolation.

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and even if a sudden interfacing system LOCA were to occur, it should be contained and fully within the anticipated design basis LOCA envelope for the plant.

A clear safety rationale needs to be established for increased and varying PIV requirements since these tests clearly result in increased occupational exposures, manpower being diverted to the periodic testing and to increased unavailability of the plant. This matter should be reexamined in conjunction with (or soon after) resolution of the leak rate issue.

Please have your staff contact Walt Schwink (Ext. 28639) to arrange a specific CRGR review date.

Original Signed by
V. Stello

Victor Stello, Jr.
Deputy Executive Director
Regional Operations and Generic
Requirements

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FEB 15 1985

Docket No. 50-412

MEMORANDUM FOR: Harold Denton, Director
Office of Nuclear Reactor Regulation

FROM: James P. Knight, Acting Director
Division of Engineering

SUBJECT: TECHNICAL SPECIFICATION FOR PRESSURE ISOLATION
VALVES AT BEAVER VALLEY UNIT 2

Current instructions to the staff regarding second plant technical specifications at two unit sites is that the technical specifications should be the same as those of the first unit (Office Letter No. 38 Supplement). However, the Beaver Valley 1 technical specifications for pressure isolation valves do not reflect post TMI-2 staff concerns about intersystem LOCA events both inside and outside containment as now written, and should, therefore, not be extended to Beaver Valley 2. Specifically, the list of pressure isolation valves for Beaver Valley Unit 1 only covers the "Event V" valves and not all pressure isolation valves as has been done for all plants licensed since the TMI-2 accident. Only six valves of a total of about 34 pressure isolation valves are currently covered in the Beaver Valley 1 technical specifications.

The purpose of including all pressure isolation valves in the technical specifications is to assure that these valves are subjected to limiting conditions for operation (LCO) and surveillance requirements in order to reduce the potential for a LOCA either inside or outside containment. The "Event V" valve list was based solely on the WASH 1400 study which addressed only a LOCA which bypassed containment. The "Event V" orders, which mandated surveillance and LCO for an abbreviated list of valves, was intended to address only the WASH-1400 dominant accident scenario (Event V). Thereafter, the staff, through its review of IST programs at operating reactors and review of complete pressure isolation valve lists in NTOL technical specifications, has been requiring complete lists of pressure isolation valves in the technical specifications. This is in accordance with requests from the Division of Systems Integration as well as previous agreements between the Division of Engineering and the Division of Licensing.

Accordingly, we request approval to impose the latest standard technical specifications together with the complete list of pressure isolation valves for Beaver Valley 2.

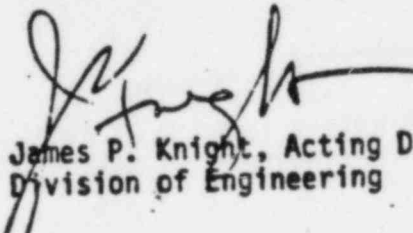
CONTACT: O. Rothberg, DE:MEB, x27864

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Harold Denton

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During the forthcoming review of the Beaver Valley Unit 1 first full 120 month Inservice Testing Program for Pumps and Valves, scheduled for completion in September, 1986, we will recommend to the Division of Licensing that the Unit 1 technical specifications be amended to include all of the pressure isolation valves.



James P. Knight, Acting Director
Division of Engineering