

MAR 1 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: STANDARD TECHNICAL SPECIFICATIONS FOR PRESSURE ISOLATION
VALVES (PIVs) - TESTING AND INSPECTION

Your February 14, 1985 memorandum (and prospective CRGR review package) sent to me on the matter of PIV leak rate acceptance criteria led me to question the wide variability in PIV test requirements being applied to different plants, plant systems and licensees. My February 25, 1985 response also questioned the safety rationale and net safety benefits because of the apparent significant increases in the amount of PIV testing being generically required by the staff. I expressed concern about these practices because they clearly result in increased occupational exposures, increased man power being diverted to such periodic PIV testing and increased plant unavailability. While you likely have a copy, I am calling your attention to the enclosed staff memorandum which my staff recently acquired while pursuing this matter. This staff memo seeks your approval to backfit technical specifications that would increase existing PIV test requirements by nearly a factor of six without a clear safety rationale being presented in support of this backfit decision. This further reinforces my concerns. I would urge you to carefully explore whether your approval of these generic practices and the staff's backfit request would serve to increase or decrease safety, and the costs involved. In any event, unless there is an immediate compelling safety concern, I believe CRGR review is warranted prior to imposing these requirements on any additional plants.

Original signed by
Victor Stello

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

8503080491
Enclosure: Memo J. P. Knight
to Denton dtd 2/15/85

cc: W. J. Dircks
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