10 CFR 50.55a(g)
PUMP OPERABILITY REQUIREMENTS

A. PURPOSE

The purpose of this guidance is to clarify the relationship between the time limits specified in Technical Specification action statements and data evaluation time periods in IWP-3220 of Section XI of the ASME Boiler and pressure vessel code, 1974 Edition with addenda through the summer 1975 for the following specific questions:

1. Do the Technical Specification action statement time periods run consecutive or concurrently with the data evaluation time (96 hours) given in IWP-3220 of Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition with addenda through the summer 1975.

2. When should the test results be reviewed and, if out of specification, the associated pump declared inoperable.

B. DISCUSSION

It should be noted that the following guidance is limited to those facilities that fall under the 1974 Edition of the ASME Code with addenda through the summer of 1975 because subsequent addenda may modify the requirements.

C. RESPONSE FOR QUESTION I

The Technical Specification ACTION statement time period starts after the determination is made that the pump is inoperable as defined in Section XI, IWP-3230(c).[1] If the data are within the Required Action Range of Table IWP-3100-2 and it is decided to recalibrate the instruments and rerun the test, as provided for in IWP-3230(b), the Technical Specification ACTION statement time starts when the determination is made that the data are within the Required Action Range. The reasoning behind the preceding statement

[1] Applicable pages of the Code are enclosed for your information.

is that once the determination is made that the data are within the Required Action Range the pump must be declared inoperable. The provisions in IWP-3230 to recalibrate and rerun the test to show the pump is still capable of fulfilling its function are interpreted by NRC as an alternative to replacement or repair, not an additional action that can be taken before declaring the pump inoperable.

D. RESPONSE FOR QUESTION 2

The answer to the second question is that as soon as the data are recognized as being within the Required Action Range the pump must be declared inoperable. Section XI, IWP-6230, "Inservice Test Plans", states that the test plan shall include "The reference values (Table IWP-3100-1), limits of P_i and T_b (Table IWP-3100-2), and any other values required by this Subsection." This statement then requires the acceptance criteria to be included in the test plan. With that information available, the shift supervisor should be able to make the determination as to whether or not the data meets the requirements. The important point is that once data becomes available that shows the pump cannot meet the inservice inspection requirements and by definition cannot fulfill its function then the pump must be declared inoperable.

END