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General Comment

Comment on Proposed 10CFR50.55a Rulemaking Section C ASME OM Code

10 CFR 50.55a(b)(3)(xi) OM Condition: Valve Position Indication

The NRC proposes to amend 50.55a(b)(3)(xi) for the implementation of paragraph ISTC3700, Position Verification Testing, in the ASME OM Code to apply to the 2012 Edition through the latest edition and addenda of the ASME OM Code incorporated by reference in 50.55a(a)(1)(iv). This will allow future rulemakings to revise 50.55a(a)(1)(iv) to incorporate the latest edition and addenda of the ASME OM Code without the need to revise 50.55a(b)(3)(xi). In addition, the NRC proposes to clarify that this condition applies to all valves with remote position indicators within the scope of Subsection ISTC, Inservice Testing of Valves in Water-Cooled Reactor Nuclear Power Plants, including MOVs within the scope of Mandatory

Appendix III, Preservice and Inservice Testing Active Electric Motor-Operated Valve Assemblies in Water-Cooled Reactor Nuclear Power Plants. ISTC3700 references Mandatory Appendix III for valve position testing of MOVs. The development of Mandatory Appendix III was intended to verify valve position indication as part of the diagnostic testing performed on the intervals established by the appendix. This clarification will ensure that verification of valve position indication is understood to be important for all valves with remote position indication addressed in Subsection ISTC and all of its mandatory appendices.

Comment: The intent of this OM Condition is well understood by the industry and several plants have implemented the ASME OM Code 2012 Edition, including the Valve Position Indication requirements specified in the condition. At those plants, valves with remote position indication, other than MOVs, supplemental position verification activities are performed at a two year interval as required by ISTC-3700. Most plants have voluntarily included MOVs in the scope of supplemental position verification. For some MOVs the periodic diagnostic testing (DIAG) in accordance with Appendix III-3300 is utilized as the method for supplemental position verification. Such testing may be performed at intervals of up to 10 years. For other MOVs the Local Leak Rate Testing (LLRT) provides the appropriate conditions for supplemental position verification. LLRTs may be performed at intervals of up to 6 years. In some cases System Operating Procedures, such as for fill and vent, provide the necessary conditions for crediting MOV supplemental position verification and are performed every 2 years or less.

The wording in the proposed condition above has been discussed with industry experts and there is a lack of consensus on what the condition requires in terms of allowed MOV supplemental position verification test interval. Some individuals believe MOV supplemental position verification must be performed every 2 years per ISTC-3700 requirements and other individuals believe it can be performed at intervals up to 10 years. As described above, there is a variety of activities being performed or credited to satisfy MOV supplemental position verification, and at a variety of intervals.

Recommend the wording of the proposed rulemaking be enhanced to clearly state that, whatever method or activity is being performed or credited, MOV supplemental position verification must be performed at least once every 10 years.

Attachments

E Cavey Comment on Proposed 10CFR50.55a

Comment on Proposed 10CFR50.55a Ruling
Section C ASME OM Code
Discussion

10 CFR 50.55a(b)(3)(xi) OM Condition: Valve Position Indication

The NRC proposes to amend § 50.55a(b)(3)(xi) for the implementation of paragraph ISTC-3700, “Position Verification Testing,” in the ASME OM Code to apply to the 2012 Edition through the latest edition and addenda of the ASME OM Code incorporated by reference in § 50.55a(a)(1)(iv). This will allow future rulemakings to revise § 50.55a(a)(1)(iv) to incorporate the latest edition and addenda of the ASME OM Code without the need to revise § 50.55a(b)(3)(xi). In addition, the NRC proposes to clarify that this condition applies to all valves with remote position indicators within the scope of Subsection ISTC, “Inservice Testing of Valves in Water-Cooled Reactor Nuclear Power Plants,” including MOVs within the scope of Mandatory Appendix III, “Preservice and Inservice Testing Active Electric Motor-Operated Valve Assemblies in Water-Cooled Reactor Nuclear Power Plants.” ISTC-3700 references Mandatory Appendix III for valve position testing of MOVs. The development of Mandatory Appendix III was intended to verify valve position indication as part of the diagnostic testing performed on the intervals established by the appendix. This clarification will ensure that verification of valve position indication is understood to be important for all valves with remote position indication addressed in Subsection ISTC and all of its mandatory appendices.

Comment: The intent of this OM Condition is well understood by the industry and several plants have implemented the ASME OM Code 2012 Edition, including the Valve Position Indication requirements specified in the condition. At those plants, valves with remote position indication, other than MOVs, supplemental position verification activities are performed at a two year interval as required by ISTC-3700. Most plants have voluntarily included MOVs in the scope of supplemental position verification. For some MOVs the periodic diagnostic testing (DIAG) in accordance with Appendix III-3300 is utilized as the method for supplemental position verification. Such testing may be performed at intervals of up to 10 years. For other MOVs the Local Leak Rate Testing (LLRT) provides the appropriate conditions for supplemental position verification. LLRT’s may be performed at intervals of up to 6 years. In some cases System Operating Procedures, such as for fill and vent, provide the necessary conditions for crediting MOV supplemental position verification and are performed every 2 years or less.

The wording in the proposed condition above has been discussed with industry experts and there is a lack of consensus on what the condition requires in terms of allowed MOV supplemental position verification test interval. Some individuals believe MOV supplemental position verification must be performed every 2 years per ISTC-3700 requirements and other individuals believe it can be performed at intervals up to 10 years. As described above, there is a variety of activities being performed or credited to satisfy MOV supplemental position verification, and at a variety of intervals. **Recommend the wording of the proposed rulemaking be enhanced to clearly state that, whatever method or activity is being performed or credited, MOV supplemental position verification must be performed at least once every 10 years.**