

**From:** Venkataraman, Booma  
**Sent:** Thursday, March 12, 2020 11:21 AM  
**To:** Margaret M Offerle  
**Cc:** Arora, Surinder; Tseng, Ian  
**Subject:** Fermi 2: Relief Request VRR-004, Minor Clarifications to ensure consistency with the specific language in the ASME Code

**Expires:** Monday, May 11, 2020 12:00 AM

Peg,

On February 27, 2020, a conference call was held between NRC staff and DTE Electric Company (DTE) regarding the Relief Request, VRR-004 related to the Inservice Testing (IST) Program, fourth 10-year interval. This was not a request for additional information.

By letter dated October 8, 2019, DTE requested the NRC for approval of a proposed alternative, pursuant to 10 CFR 50.55a(z)(1), to the requirements of the ASME OM Code Subsections ISTC-3700, III-3310, and 10 CFR 50.55a(b)(3)(xi), for a set of valves included in the Fermi 2 IST Program fourth 10-year interval.

The NRC staff had the following clarifying question:

The submittal states that for the listed active motor operated valves in Attachment 1, "position indication testing requirements are identified in Mandatory Appendix III as described in ISTC-3700." The staff notes that ISTC-3700, and its reference to Mandatory Appendix III applies to position verification testing for valves with remote position indicators, and not position indication testing. Position indication testing, or testing valve obturator movement as determined by observing an appropriate indicator, such as indicating lights, is addressed in ISTC-3530.

To prevent confusion, please clarify which OM Code requirements are applicable to your relief request.

Further to the conference call, DTE provided additional clarity in the e-mail below. This e-mail is being put on the docket in public ADAMS as a record of this interchange.

Thanks, Booma

**Booma Venkataraman**

*Project Manager, NRR/DORL/LPL3*

*Office of Nuclear Reactor Regulation*

[Booma.Venkataraman@nrc.gov](mailto:Booma.Venkataraman@nrc.gov)

301.415.2934

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**From:** Margaret M Offerle <margaret.offerle@dteenergy.com>

**Sent:** Monday, March 09, 2020 5:12 PM

**To:** Venkataraman, Booma <Booma.Venkataraman@nrc.gov>

**Subject:** [External\_Sender] Fermi VRR-004

Booma,

DTE review of the relief request VRR-004, submitted by DTE letter NRC-19-0067 dated October 8, 2019, has identified the need for some minor clarifications. These minor clarifications are to ensure consistency with the specific language used in the ASME OM Code.

Page 3 of the enclosure to NRC-19-0067 currently includes the following text:

For active motor operated valves in Attachment 1, position indication testing requirements are identified in Mandatory Appendix III as described in ISTC-3700. Per

Subsections III-3300 and III-3310, position indication testing is performed with inservice testing, which itself is performed at a variable frequency.

A minor clarification to this text on page 3 is provided as follows:

For active motor operated valves in Attachment 1, **position verification requirements** are identified in Mandatory Appendix III as described in ISTC-3700. Per Subsections III-3300 and III-3310, **verification of remote position indication** is performed with inservice testing, which itself is performed at a variable frequency.

Page 4 of the enclosure to NRC-19-0067 currently includes the following text:

Note that this relief request is not proposing to alter the frequency of position indication testing itself, as required by Subsection ISTC-3700 (or Subsection III-3300(e) for active motor operated valves). Therefore, position indication testing of the valves in Attachment 1 will continue to be performed at a frequency of two years in accordance with ISTC-3700 (or at the frequency in accordance with Subsection III-3310 for active motor operated valves).

A minor clarification of this text on page 4 is provided as follows:

Note that this relief request is not proposing to alter the frequency of position indication testing **that does not include obturator verification (i.e., comparison of local observation to indicating lights)**, as required by Subsection ISTC-3700 (or Subsection III-3300(e) for active motor operated valves). Therefore, **this type of** position indication testing of the valves in Attachment 1 will continue to be performed at a frequency of two years in accordance with ISTC-3700 (or at the frequency in accordance with Subsection III-3310 for active motor operated valves).

Footnotes 1 and 11 to the table in the attachment to NRC-19-0067 currently state:

1. The standard method for performing position indication test will be performed every two years in accordance with the ISTC-3700 frequency requirements.
11. Position indication of these active motor operated valves will follow more restrictive ISTC-3700 frequency requirement (2 year) instead of Mandatory Appendix III due to in-progress valve re-classification.

A minor clarification to the table footnotes 1 and 11 is provided as follows:

1. The standard method for performing position indication **testing (i.e. comparison of local observation to indicating lights)** will be performed every two years in accordance with the ISTC-3700 frequency requirements.
11. **Obturator verification** of these active motor operated valves will follow more restrictive ISTC-3700 frequency requirement (2 year) instead of Mandatory Appendix III due to in-progress valve re-classification.

Please let us know if you have any questions regarding these minor clarifications. Thank you.

Peg

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 476

**Mail Envelope Properties** (MN2PR09MB400039836D05EC0F339AA7F686FD0)

**Subject:** Fermi 2: Relief Request VRR-004, Minor Clarifications to ensure consistency with the specific language in the ASME Code  
**Sent Date:** 3/12/2020 11:20:30 AM  
**Received Date:** 3/12/2020 11:20:00 AM  
**From:** Venkataraman, Booma

**Created By:** Booma.Venkataraman@nrc.gov

**Recipients:**  
"Arora, Surinder" <Surinder.Arora@nrc.gov>  
Tracking Status: None  
"Tseng, Ian" <Ian.Tseng@nrc.gov>  
Tracking Status: None  
"Margaret M Offerle" <margaret.offerle@dteenergy.com>  
Tracking Status: None

**Post Office:** MN2PR09MB4000.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	5276	3/12/2020 11:20:00 AM

**Options**  
**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:** 5/11/2020