

January 22, 1991

TO: ALL LICENSEES OF OPERATING NUCLEAR POWER PLANTS AND HOLDERS OF
CONSTRUCTION PERMITS FOR NUCLEAR POWER PLANTS, AND INDIVIDUALS ON
THE ATTACHED DISTRIBUTION LIST

SUBJECT: SUPPLEMENT TO MINUTES OF THE PUBLIC MEETINGS ON GENERIC LETTER 89-04

In June 1989, the NRC staff held four public meetings to discuss Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." Minutes of these meetings were compiled and issued on October 25, 1989.

The staff has reviewed its response regarding stop-check valve testing that was provided in the above referenced meeting minutes. Based on that review, additional guidance concerning closure verification for stop-check valves is enclosed. This supplement to the meeting minutes is not intended to convey any new requirements and is not considered a backfit.

Please direct questions or comments regarding this supplement to the appropriate NRC Project Manager.

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
As stated

REVISION 1 TO MINUTES OF THE PUBLIC MEETINGS
TO DISCUSS GENERIC LETTER 89-04,
"GUIDANCE ON DEVELOPING ACCEPTABLE INSERVICE TESTING PROGRAM"

On April 3, 1989, the NRC issued Generic Letter 89-04 to guide licensees and holders of construction permits in correcting several weaknesses found by the NRC staff in inservice testing (IST) programs at nuclear power plants. Four public meetings were held to discuss questions raised by the generic letter. On October 25, 1989, the NRC issued "Minutes of the Public Meetings on Generic Letter 89-04," summarizing (1) the opening remarks made by NRC representatives and (2) the responses to all of the questions raised at the meeting.

The NRC staff considers that additional guidance is necessary concerning ASME Code requirements for testing stop-check valves with respect to one of the responses made in the above referenced meeting minutes with regard to ASME Section XI, Subsection IWV-3522. Based upon the review of our response to question 25 regarding stop-check valve testing, the staff offers the following guidance to licensees and construction permit holders:

- A. If there is no safety-related function in the closed position of the stop-check valves, valve closure is only necessary to ensure repeatable opening stroke time testing. Valves may be closed by using a handwheel or hand switch.
- B. If the safety-related function of the system is achieved by valve closure using a handwheel or a hand switch, then exercising the valve by this method meets the ASME Code requirements of IWV-3522.
- C. If a prompt closure of these valves on cessation or reversal of flow is required to accomplish a safety-related function, closure must be verified by reverse flow testing or such other positive means as acoustic monitoring or radiography.
- D. These valves should be disassembled for verifying valve closure only if no other means of verification is possible because disassembly provides little information on valve capability to seat promptly on cessation or reversal of flow. Furthermore, if the method involves extensive disassembly, a post-reassembly test would be necessary per IWV-3200 because disassembly and inspection can lead to increased probability of human error when the valve is reassembled. Disassembly and inspection should only be used if closure testing of a check valve using reverse flow and system parameters is not feasible. The licensee should investigate the use of non-intrusive testing techniques and should implement them if they are demonstrated to be effective. In this case, disassembly and inspection should no longer be used for ASME Code purposes.

This guidance expands on the response provided in the meeting minutes. The staff's response contained in the meeting minutes was not intended to address instances where verification of prompt closure was required to ensure that a safety-related function would be accomplished.