



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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June 24, 2021

MEMORANDUM TO: Ian H. Tseng, Acting Chief  
Mechanical Engineering and Inservice Testing Branch  
Division of Engineering and External Hazards  
Office of Nuclear Reactor Regulation

FROM: Thomas G. Scarbrough, Senior Mechanical Engineer /RA/  
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SUBJECT: NRC PUBLIC MEETING ON JUNE 14, 2021, TO DISCUSS  
SUPPLEMENTAL VALVE POSITION INDICATION  
REQUIREMENTS

On June 14, 2021, the staff of the U.S. Nuclear Regulatory Commission (NRC) held a public meeting to discuss the requirements for valve position indication in the American Society of Mechanical Engineers *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (ASME OM Code) as supplemented by condition (b)(3)(xi) in Section 55a of Part 50 in Title 10 of the *Code of Federal Regulations* (10 CFR 50.55a(b)(3)(xi)). The NRC staff also discussed the regulatory process for alternative requests to the valve position indication requirements specified in 10 CFR 50.55a(z).

As stated in the meeting announcement, the public meeting on June 14, 2021, was an Information Meeting with a Question and Answer Session. The purpose of this meeting was for the NRC staff to meet directly with individuals to discuss regulatory and technical issues. Attendees had an opportunity to ask questions of the NRC staff or make comments about the issues discussed throughout the meeting; however, the NRC staff did not actively solicit comments toward regulatory decisions at the meeting.

During its presentation, the NRC staff discussed the background of the supplemental valve position indication requirement specified in 10 CFR 50.55a(b)(3)(xi). The staff also discussed the risk insights related to the importance of accurate valve position verification provided by the remote indicating lights. The staff provided examples of alternative requests in accordance with 10 CFR 50.55a(z) to extend the initial implementation of the supplemental valve position indication requirements in 10 CFR 50.55a(b)(3)(xi). The staff also provided examples of alternative requests for extensions of the 2-year test interval required in ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Water-Cooled Reactor Nuclear Power Plants," paragraph ISTC-3700, "Position Verification Testing," for position verification testing of valves with remote position indicating lights.

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The staff discussed the specification of ASME OM Code Cases by licensees as part of alternative requests to help streamline the review process. For example, the staff noted that ASME has issued OM Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation," to provide an alternative approach for extending the 2-year test frequency specified in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for valves with a stem-disk connection that is not susceptible to separation. To improve the efficiency and effectiveness of the review process, the staff suggested that licensees explore submitting alternative requests related to the valve position indication requirements through the NRC Web-Based Relief Request (WRR) Portal. At the time of the meeting, the staff indicated that it was considering whether to review EPRI Technical Report 3002019621, "Susceptibility of Valve Applications to Failure of the Stem-to-Disk Connection," for guidance in implementing Code Case OMN-28.

During the Question and Answer Session of the public meeting, the Nuclear Energy Institute (NEI) presented its views on the valve position indication requirements in the ASME OM Code and 10 CFR 50.55a(b)(3)(xi). Following the public meeting, the NRC staff provided the NEI suggestions to the applicable ASME OM Code committees for their consideration in updating ASME OM Code, Subsection ISTC, paragraph ISTC-3700.

Enclosed are the slides presented by the NRC staff during the public meeting. Also enclosed are the NEI slides presented at the meeting

Enclosures: As stated

Subject: NRC PUBLIC MEETING ON JUNE 14, 2021, TO DISCUSS SUPPLEMENTAL VALVE  
POSITION INDICATION REQUIREMENTS DATED: June 24, 2021

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**ADAMS Accession Nos.:****ML21175A121 - Package****ML21175A113 – Meeting Summary****ML21162A122 – NRC Slides****ML21175A123 - NEI Slides****\*via email****NRR-106**

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