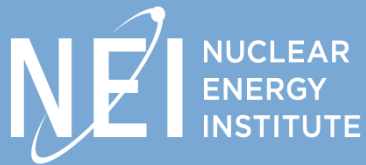


Industry Feedback on Valve Position Indication Testing and Regulatory Paths

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Overview

- Timing of Initial Supplemental Position Indication Testing
- Feedback on Position Indication Testing and Recommendations for Regulatory Paths
- ASME Code Case OMN-28 Implementation

Timing of Initial Supplemental Position Indication Testing

- Industry appreciates NRC recognizing implementation issues and providing licensees an efficient regulatory path
- Industry and NRC had different interpretations of when initial implementation was required
 - Within 24 months of Program Update to OM Code 2012 Ed.
 - Within 24 months from previously performed indication test
- Supplemental position indication testing for some valves is limited to specific plant operating conditions, i.e. refueling outage, and can't be conducted within 24 months from previous 10 year interval's position indication test
- Licensee alternatives and revision to condition

Industry Feedback and Recommendations on Valve Position Indication Testing

Issue:

- There are interpretation differences concerning Supplemental Testing implementation.

Recommendations:

Revise condition to;

- clarify when testing is required to begin and be in full compliance,
- clarify supplemental testing is not required to be concurrent with ISTC-3700 testing,
- allow supplemental testing to be performed at the next opportunity, if plant conditions prohibit initial testing within the established ISTC-3700 surveillance period, and
- clarify the initial surveillance due date when implemented extended interval testing for non-susceptible valves.

Industry Feedback and Recommendations on Valve Position Indication Testing

Issue:

- Motor Operated Valve (MOV) Position Verification Testing (ISTC-3700) interval changed with the adoption of the OM Code 2012 Edition (or later) and OM Appendix III, along with the implementation of supplemental testing. There can be multiple and different due dates for MOV supplemental testing depending on the interpretation of the combined changes.

Recommendations:

- Revise condition such that MOV supplemental testing is required to be in compliance with Appendix III testing interval.
- Confirm MOV supplemental testing will follow OMN-26 extended inservice test intervals.

Industry Feedback and Recommendations on Valve Position Indication Testing

Issue:

- Supplemental Testing of Passive valves can challenge plant operations and results in a hardship without a commensurate benefit to safety.
- Passive Valve Examples:
 - Valves are closed boundary between safety related and non-safety related systems. Opening the valves places the Unit in a short duration LCO and increases risk to the plant by stroking the valve in a condition which is not required by design basis.
 - Valves are closed boundary for charcoal fire dousing. Supplemental testing risks introduction of moisture to the charcoal beds.
 - Passive pump suction valves are required to remain open and are proven during every pump run. A close supplemental test does not provide a benefit to safety.

Recommendation:

- Revise the condition to eliminate supplemental testing of passive valves, or to only perform supplemental testing in the valve's normal position.

Industry Feedback and Recommendations on Valve Position Indication Testing

Issue:

- Licensee's are requesting relief to utilize NRC approved performance-based intervals for supplemental testing.

Recommendation:

- Revise condition to permit the use of NRC approved performance-based intervals for supplemental testing such as 10 CFR 50 Appendix J, approved performance-based Code Cases (OMN-23 & OMN-27), or approved site-specific relief request without having to re-submit for relief.

Industry Feedback and Recommendations on Valve Position Indication Testing

Issue:

- Supplemental Testing is being performed every two years on valves that are not susceptible to stem-disc separation.

Recommendation:

- Revise the condition to eliminate the need to perform supplemental testing on valves that are not susceptible to stem-disc separation, or approve the use of OMN-28 to extend the Position Verification and supplemental testing intervals to provide consistent industry implementation guidance.
- Endorse the EPRI Technical Report, “Susceptibility of Valve Applications to Failure of the Stem-to-disk Connection” as an acceptable method for determining valve susceptibility.

ASME Code Case OMN-28 Implementation



- The published proposed amendment of 10 CFR 50.55a(b)(3)(xi) will allow a licensee to perform the position verification testing specified in ISTC-3700 on a ten-year interval for valves determined and documented not to be susceptible to stem-disk separation.
- Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation" mirrors the philosophy of the proposed 10 CFR 50.55a(b)(3)(xi) OM Condition and allows position verification testing performed at 12-year intervals.
- Proposed 10 CFR 50.55a(b)(3)(xi) change will not be published until Spring 2022 while licensees need relief to implement Code Case OMN-28 for Fall '21 and Spring '22 outages.

Relief Path for Code Case OMN-28

- Relief requests granted for implementation of Code Case OMN-26, "Alternative Risk-Informed and Margin Based Rules for Inservice Testing of Motor Operated Valves" have been based on approval of the methodology.
- Approval to use Code Case OMN-28 should be approved in the same fashion as OMN-26; based on application of a defined acceptable methodology with completed justification for each valve available for regulatory review.