

COMMITTEE CORRESPONDENCE

committee: OM-19, Subgroup for Air and Hydraulic Operated Valves

subject: Comment on Draft Regulatory Guide DG-1089

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to: Rules and Directives Branch
Office of Administration
US Nuclear Regulatory Commission
Washington DC 20555-0001

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The Subgroup for Air and Hydraulically Operated Valves, OM-19, submits the attached comments regarding the conditions placed on Code Case OMN-12 referenced in Draft Regulatory Guide DG-1089.

The Subgroup believes the Code Case has been developed utilizing a mixture of personnel very well versed in the maintaining, trouble shooting, and diagnostically testing air operated valves in all applications of our industry. The Subgroup also believes the conditions placed on the Code Case by DG-1089 would make adopting the Code Case burdensome for the utilities.

The Subgroup respectfully request Code Case OMN-12 be endorsed by DG-1089 without conditions.

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ASME SUBGROUP OM-19
Comments on NRC Conditions on OMN-12 Code Case

Condition 1

The ASME OM Sub-Group AOV/HOV believes that Dynamic Testing may be used to validate calculations and should not be required as a baseline and/or periodic test. The type test required for baseline and/or periodic test varies dependent on valve type and application and/or any combination of valve type and application and should be left to the discretion of the owner, who would provide a basis for the type test chosen.

There is a concern in the industry about the requirement for dynamic testing. Dynamic testing is dangerous to plant equipment and plant personnel, requires special test procedures, puts the plant through unnecessary transients and in most cases can be technically covered by a mixture of calculations and static testing. Additionally, there are varying definitions of dynamic test. The Sub-Group on AOV is currently in the process of defining what constitutes a dynamic test.

Dynamic testing is expensive and plant intrusive. Where plants are able to prove design basis capability with a combination of calculations and static testing, this practice should be allowed.

The Code Case allows for dynamic testing where the Owner deems necessary or appropriate. To require a percentage of the AOVs to be dynamically tested could cause system perturbations and challenge the plant in ways that could be unsafe and detrimental to plant operation.

There are valves that cannot be dynamically tested. The usual NRC wording of "Where practical" needs to be added.

Condition 2

Paragraphs 4.2.2 (4222) and 4.2.2.3 (4223) are consistent with paragraph 3.3.1 of OMN-1.

Condition 3

The intent of the code case is to perform this action. This will be clarified in future revisions of the code case.

Condition 4

The ASME OM Sub-Group AOV/HOV believes that the paragraphs 4.4.1 (4410) and 4.4.2 (4420) adequately addresses degradation and the NRC concern. The terminology used in these paragraphs is consistent with paragraphs 6.1 and 6.2 of OMN-1. These paragraphs of OMN-12 require the owner to establish acceptance criteria which will ensure the AOV has adequate margin to address any degradation occurring between periodic tests.

Condition 5

The requirements specified in NRC Condition 5 drive the utilities to have the same requirements for high safety significant and low safety significant valves. NRC Condition 5 requires utilities to perform a design basis calculation, and perform verification and periodic testing on LSSC. Because LSSC's are safety related, the utility is driven to use the same standards as imposed on HSSC's. The primary reason for developing a Risk Informed IST Program is to focus on HSSC's while reducing the focus on LSSC's. By implementing NRC Condition 5, there is no reduction of effort allowed for the LSSC's, therefore no incentive for the utility to develop Risk Informed Programs which are more rigorous in the treatment in HSSC's.

Condition 6

The requirements of Condition 6 require LSSC set point control to be based on dynamic testing or test-based methodology. The definition of test-based methodology is not fully understood. There is a concern in the industry about the requirement for dynamic testing especially on LSSC's. Dynamic testing is dangerous to plant equipment and plant personnel, requires special test procedures, and puts the plant through unnecessary transients. Because the LSSC's have low safety significance, the ASME OM Sub-Group AOV/HOV believes that the code case provides adequate requirements for set point control that ensure AOV's are capable of performing their functions.

Condition 7

The requirements of Condition 7 are a major philosophy change from current IST requirements. The requirements to perform diagnostic testing would require the utilities to develop special testing procedures and processes. Condition 7 imposes similar testing requirements on LSSC's as HSSC's. Because the LSSC's have low safety significance, the ASME OM Sub-Group AOV/HOV believes that the code case provides adequate requirements for set point controls that ensure AOVs are capable of performing their safety functions.

Condition 8

The intent of the code case is to perform this action. This will be clarified in future revisions of the code case.