



LR-N08-0308
December 31, 2008

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Salem Nuclear Generating Station, Unit Nos. 1 and 2
Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Subject: Submittal of Relief Requests Associated with the Fourth Inservice Testing Interval

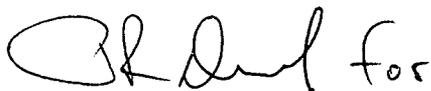
In accordance with 10 CFR 50 55a, "Codes and standards," PSEG Nuclear LLC (PSEG) hereby requests NRC approval of the attached requests for the fourth 10-year inservice testing (IST) interval for the Salem Nuclear Generating Station, Unit Nos. 1 and 2. The fourth interval of the Salem IST program is being developed in accordance with the requirements in the ASME OM Code, 2001 Edition through 2003 Addenda. The fourth interval begins on August 31, 2009. Attachments 2 and 3 to this letter provide the calculations used to determine the acceptance criteria associated with the alternative testing proposed in requests V-01 and V-02.

PSEG requests approval of these requests by August 14, 2009.

There are no regulatory commitments in this letter or attachments.

If you have any questions or require additional information, please contact Mr. Paul Duke at 856-339-1466.

Sincerely,



Christine T. Neely
Director - Regulatory Affairs
PSEG Nuclear LLC

A047
NRR

Attachments:

1. Relief Requests Associated with the Fourth Inservice Testing (IST) Interval
2. Calculation S-1-SJ-MDC-1539, Rev. 3, "Accumulator Pressure Decay Time during Discharge Testing"
3. Calculation S-2-SJ-MDC-1394, Rev. 5, "Accumulator Pressure Decay Time during Discharge Test"

cc: S. Collins, Regional Administrator – NRC Region I
R. Ennis, Project Manager - USNRC
NRC Senior Resident Inspector - Salem
P. Mulligan, Manager IV, NJBNE

ATTACHMENT 1**Salem Nuclear Generating Station, Unit Nos. 1 and 2****Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311****Relief Requests Associated with the Fourth Inservice Testing Interval****Pump Relief Requests**

P-01	Not Used
P-02	Use of ASME Code Case OMN-6

Valve Relief Requests

V-01	Accumulator Outlet Check Valve Testing
V-02	Accumulator Outlet Check Valve Testing
V-03	Not Used
V-04	Containment Sump Suction Valve Testing
V-05	Use of ASME Code Case OMN-1
V-06	Use of ASME Code Case OMN-8

Salem Units 1 and 2 Inservice Test Program

PUMP RELIEF REQUEST P-02

Proposed Alternative In Accordance with 10CFR50.55a(a)(3)(i)

On the basis that the proposed alternative provides an acceptable level of quality and safety.

Component(s)

Affected: All Class 2 and 3 pumps included in the IST Program

Component/

System Function: Various

Applicable Code

Edition and Addenda: ASME OM Code-2001, with Addenda through Omb-2003

Applicable Code

Requirement(s): ISTA-3130, "Application of Codes Cases," ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."

ISTB-3510, "Data Collection - General," ISTB-3510(b)(2) states, "Digital instruments shall be selected such that the reference value does not exceed 70% of the calibrated range of the instrument."

Reason for Request:

Salem requests permission to use ASME Code Case OMN-6, "Alternate Rules for Digital Instruments" which allows digital instruments to be selected such that the reference value does not exceed 90% of the calibrated range of the instrument in lieu of 70% as specified in ISTB-3510(b)(2). RG 1.192 unconditionally accepts this Code Case for use and allows licensees with an applicable Code of record to implement Code Case OMN-6 without submitting request for relief from their Code of record. The Code of record for Salem Fourth 10-Year IST Interval is OM Code-2001 Edition with Addenda through Omb-2003 and the applicable Code for OMN-6, as stated in the Code Case, is ASME OM Code-1990 Edition through Omb Code-1997.

**Proposed Alternative
and Basis for Use:**

Pursuant to the alternative rules for digital instruments provided in Code Case OMN-6, Salem proposes to use digital instruments where the reference value does not exceed 90% of the calibrated range of the instrument. Code Case OMN-6 has been determined by the NRC to provide an acceptable level of quality and safety by its acceptance in RG 1.192. Additionally, it should be noted that the Code Case has been incorporated into 2006 Addenda to the ASME OM Code.

Salem Units 1 and 2 Inservice Test Program

**Proposed Alternative
and Basis for Use:**
(Cont.)

Using the provisions of this relief request as an alternative to the range requirement for digital instruments specified in ISTB-3510(b)(2) provides an acceptable level of quality for data collection. Code Case OMN-6 should be considered acceptable for use with OM Code-2001 through OMB-2003 Addenda as the Code of record.

**Duration of Proposed
Alternative:**

The proposed alternative identified in this relief request shall be utilized during the Fourth Ten Year IST Interval.

Precedents:

None

References:

1. Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Table 1, "Acceptable OM Code Cases"
2. Code Case OMN-6, "Alternate Rules for Digital Instruments"

Salem Units 1 and 2 Inservice Test Program

VALVE RELIEF REQUEST - V-01

Proposed Alternative in Accordance with 10CFR50.55a(f)(5)(iii)

Based on the impracticality of performing testing in accordance with the Code.

Component(s)

Affected:

11/21SJ55 – 11/21 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

12/22SJ55 – 12/22 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

13/23SJ55 – 13/23 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

14/24SJ55 - 14/24 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

Component/

System Function:

These Category AC check valves are located in the discharge lines from the respective safety injection accumulators. The valves perform an active safety function in the open and closed positions. The valves must be capable of opening during a large break LOCA to provide a flow path for SI accumulator discharge to the RCS cold legs when reactor pressure drops below accumulator pressure. The valve must be capable of closure to prevent divergence of safety injection and recirculation flow subsequent to the accumulators dumping their contents. These valves also function as RCS pressure isolation valves. This function prevents exposing the SI accumulators to RCS pressure which would compromise accumulator pressure boundary integrity.

Applicable Code

Edition and Addenda: ASME OM Code-2001, with Addenda through OMB-2003

Applicable Code

Requirement(s):

ISTC-5221, "Valve Obturator Movement," ISTC-5221(a)(1) states in part, "Check valves that have a safety function in both the open and closed directions shall be exercised by initiating flow and observing that the obturator has traveled to the full open position or to the position required to perform its intended safety function(s)."

Impracticality of

Compliance:

To exercise these valves to the full open position by passing the maximum required accident condition flow through the valves is impractical due to the potential for complete discharge of the accumulator water volume and subsequent nitrogen injection into the reactor coolant system.

Salem Units 1 and 2 Inservice Test Program

Impracticality of Compliance: (Cont.)

In attempting to utilize the guidance of NUREG 1482, Rev.1, Section 4.1.2 - "Exercising Check Valves with Flow and Nonintrusive Techniques," nonintrusive equipment was used during informational testing. These valves are Darling Valve & Manufacturing Co. "Clear Waterway" swing checks that are fabricated without a backstop. The valve design permits the disk to move sufficiently out of the flow path without contacting the valve body. Nonintrusive testing using acoustic and magnetic technology provides sufficient data for monitoring degradation on a periodic basis; however, full open acoustic indication is not detected or expected to show on the test trace. Nonintrusive testing is impractical since it does not verify full stroke exercising; however occasional use of this equipment during the pressure decay test provides useful condition monitoring information.

Burden Caused by Compliance:

To comply with the Code requirements for observation of obturator travel during full stroke exercising with flow or by the use of a mechanical exerciser would require replacement of the valves with a design that is more compatible with non-intrusive testing or with a design that is provided with an external arm. Valve replacement to facilitate Code required testing is a significant burden. Valve disassembly, for the purpose of exercising, would expose maintenance personnel to unnecessary radiation exposure, inconsistent with the need to keep occupational doses as low as is reasonably achievable (ALARA).

Proposed Alternative and Basis for Use:

These check valves shall be full stroke exercised to the open position during refueling outages utilizing a reduced pressure, partial accident flow test method. This controlled method is performed with the reactor vessel head removed. The test method establishes accumulator pressure between 67 and 70 psig, accumulator level between 96 and 100% and refueling cavity level between 125.5 and 126.5 feet. After establishment of the fixed parameters the test then measures the time interval required for the pressure in the associated safety injection accumulator to drop from the initial pressure to 35 psig. Engineering calculations S-1-SJ-MDC-1539/S-2-SJ-MDC-1394, "Accumulator Pressure Decay during Discharge Test," establish the test conditions and acceptance criteria and conclude that this methodology is adequate in determining that the associated check valve disk moves to the full open position. The testing performed at Salem provides a valid methodology for verifying the open function. Additionally, if the acceptance criteria are not satisfied during the test then both valves

Salem Units 1 and 2 Inservice Test Program

**Proposed Alternative
and Basis for Use:
(Cont.)**

associated with the affected accumulator shall be subject to corrective action.

Regarding reverse flow exercise testing, these valves shall be verified in the closed position during the process of performing seat leakage testing at the frequency specified in Unit 1 TS 4.4.6.3 and Unit 2 TS 4.4.7.2.2.

Using the provisions of this relief request as an alternative to the full stroke exercise requirements of ISTC-5221(a)(1) provides reasonable assurance of valve operational readiness and ensures the valves are capable of performing their intended open safety function.

**Duration of Proposed
Alternative:**

The proposed alternative identified in this relief request shall be utilized during the Fourth Ten Year IST Interval.

Precedents:

NRC Safety Evaluation dated September 30, 2005 (TAC No. MC3855). Salem Nuclear Generating Station Unit 1, Docket No. 50-272.

NRC Safety Evaluation dated January 2, 2004 (TAC No. MC1102). Salem Nuclear Generating Station Unit 2, Docket No. 50-311.

References:

None

Salem Units 1 and 2 Inservice Test Program

VALVE RELIEF REQUEST – V-02

Proposed Alternative in Accordance with 10CFR50.55a(f)(5)(iii)

Based on the impracticality of performing testing in accordance with the Code.

Component(s)

Affected:

11/21SJ56 – 11/21 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

12/22SJ56 – 12/22 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

13/23SJ56 – 13/23 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

14/24SJ56 - 14/24 Safety Inj Accumulator Outlet Line to Cold Leg
Check Vlv (Class 1)

Component/ System Function:

These Category AC check valves are located in the discharge lines from the respective safety injection accumulators downstream of the branch connection from RHR. The valves perform an active safety function in the open position. The valves must be capable of opening during a large break LOCA to provide a flow path for SI accumulator discharge to the RCS cold legs when reactor pressure drops below accumulator pressure. The valve must also be capable of opening to provide a path for low head safety injection and cold leg recirculation flow. These valves also function as RCS pressure isolation valves. This function prevents exposing the SI accumulators and RHR system piping to RCS pressure.

Applicable Code

Edition and Addenda: ASME OM Code-2001, with Addenda through OMB-2003

Applicable Code

Requirement(s):

ISTC-5221, "Valve Obturator Movement," ISTC-5221(a)(1) states in part, "Check valves that have a safety function in both the open and closed directions shall be exercised by initiating flow and observing that the obturator has traveled to the full open position or to the position required to perform its intended safety function(s)."

Impracticality of Compliance:

To exercise these valves to the full open position by passing the maximum required accident condition flow through the valves is impractical due to the potential for complete discharge of the accumulator water volume and subsequent nitrogen injection into the reactor coolant system.

Salem Units 1 and 2 Inservice Test Program

Impracticality of Compliance: (Cont.)

In attempting to utilize the guidance of NUREG 1482, Rev.1, Section 4.1.2 - "Exercising Check Valves with Flow and Nonintrusive Techniques," nonintrusive equipment was used during informational testing. These valves are Darling Valve & Manufacturing Co. "Clear Waterway" swing checks that are fabricated without a backstop. The valve design permits the disk to move sufficiently out of the flow path without contacting the valve body. Nonintrusive testing using acoustic and magnetic technology provides sufficient data for monitoring degradation on a periodic basis; however, full open acoustic indication is not detected or expected to show on the test trace. Nonintrusive testing is impractical since it does not verify full stroke exercising; however occasional use of this equipment during the pressure decay test provides useful condition monitoring information.

Burden Caused by Compliance:

To comply with the Code requirements for observation of obturator travel during full stroke exercising with flow or by the use of a mechanical exerciser would require replacement of the valves with a design that is more compatible with non-intrusive testing or with a design that is provided with an external arm. Valve replacement to facilitate Code required testing is a significant burden. Valve disassembly, for the purpose of exercising, would expose maintenance personnel to unnecessary radiation exposure, inconsistent with the need to keep occupational doses as low as is reasonably achievable (ALARA).

Proposed Alternative and Basis for Use:

These check valves shall be full stroke exercised to the open position during refueling outages utilizing a reduced pressure, partial accident flow test method. This controlled method is performed with the reactor vessel head removed. The test method establishes accumulator pressure between 67 and 70 psig, accumulator level between 96 and 100% and refueling cavity level between 125.5 and 126.5 feet. After establishment of the fixed parameters the test then measures the time interval required for the pressure in the associated safety injection accumulator to drop from an initial pressure to 35 psig. Engineering calculations S-1-SJ-MDC-1539/S-2-SJ-MDC-1394, "Accumulator Pressure Decay during Discharge Test," establish the test conditions and acceptance criteria and conclude that this methodology is adequate in determining that the associated check valve disk moves to the full open position. The testing performed at Salem provides a valid methodology for verifying the open function. Additionally, if the acceptance criteria is not satisfied during the test then both valves

Salem Units 1 and 2 Inservice Test Program

**Proposed Alternative
and Basis for Use:
(Cont.)**

associated with the affected accumulator shall be subject to corrective action.

Regarding reverse flow exercise testing, these valves shall be verified in the closed position during the process of performing seat leakage testing at the frequency specified in Unit 1 TS 4.4.6.3 and Unit 2 TS 4.4.7.2.2.

Using the provisions of this relief request as an alternative to the full stroke exercise requirements of ISTC-5221(a)(1) provides reasonable assurance of valve operational readiness and ensures the valves are capable of performing their intended open safety function.

**Duration of Proposed
Alternative:**

The proposed alternative identified in this relief request shall be utilized during the Fourth Ten Year IST Interval

Precedents:

NRC Safety Evaluation dated September 30, 2005 (TAC No. MC3855). Salem Nuclear Generating Station Unit 1, Docket No. 50-272

NRC Safety Evaluation dated January 2, 2004 (TAC No. MC1102). Salem Nuclear Generating Station Unit 2, Docket No. 50-311.

References:

None

Salem Units 1 and 2 Inservice Test Program

VALVE RELIEF REQUEST – V-04

Proposed Alternative in Accordance with 10CFR50.55a(a)(3)(ii)

On the basis that Code required testing presents a hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Component(s)

Affected: 11/12SJ44, - 11/12 Safety Injection Containment Sump Suction Valve
(Class 2)
21/22SJ44, - 21/22 Safety Injection Containment Sump Suction Valve
(Class 2)

**Component/
System Function:**

These Category B motor operated valves are located in the supply lines from the containment sump to the respective RHR pump suction. The valves perform an active safety function in the open position. They must be capable of opening to align the containment sump to the ECCS subsystems during the recirculation phase of emergency core cooling. The valves perform a passive safety function in the closed position to properly align ECCS subsystems to the RWST during the injection phase of emergency core cooling, and to prevent the RWST inventory from back flowing to the containment sump.

Applicable Code

Edition and Addenda: ASME OM Code-2001, with Addenda through OMB-2003

**Applicable Code
Requirement(s):**

ISTC-3700, "Position Indication Verification," states in part, "Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve position is accurately indicated."

Reason for Request:

These valves are located in separate compartments in the containment. The compartments are accessible from outside the containment through four foot diameter manways which must be unbolted and manually removed for entry. These manways are sealed by gaskets on the flange surface to which they are bolted. The proper sealing of this surface is necessary to ensure containment integrity. If the valves are verified for proper remote position indication (RPI) every two years, hatch removal would be required for RPI verification only. In order to minimize the potential for damage to flange surfaces and gaskets, the valves should be verified for RPI accuracy when other scheduled maintenance / inspection activities are performed. Gaining access to these compartments for verification of remote position indication by direct observation every two years presents a hardship or unusual

Salem Units 1 and 2 Inservice Test Program

**Reason for Request:
(Cont.)**

difficulty without a compensating increase in the level of quality and safety.

**Proposed Alternative
and Basis for Use:**

Remote position indication will be verified once every other refueling concurrent with Environmental Qualification inspections, or at any other time the manways are removed, but in no case more often than once every two years.

Using the provisions of this relief request as an alternative to the requirements of position indication verification of ISTC-3700 provides an acceptable level of quality for the determination that the valves' position is properly reflected by their position indication.

**Duration of Proposed
Alternative:**

The proposed alternative identified in this relief request shall be utilized during the Fourth Ten Year IST Interval.

Precedents:

NRC Safety Evaluation of Relief Requests for Third 10-Year Interval of the IST Program for Salem Nuclear Generating Station, Units Nos. 1 and 2 (TAC. Nos. MD8166, MD8167, MD8168, MD8169, MD8170 and MD8171). October 10, 2008.

References:

None

Salem Units 1 and 2 Inservice Test Program

VALVE RELIEF REQUEST – V-05

Proposed Alternative in Accordance with 10CFR50.55a(a)(3)(i)

On the basis that the proposed alternative provides an acceptable level of quality and safety.

Component(s)

Affected: Certain motor-operated valve assemblies currently included in the Salem Motor-Operated Valve Program

**Component/
System Function:**

Various

Applicable Code

Edition and Addenda: ASME OM Code-2001, with Addenda through OMB-2003

**Applicable Code
Requirement(s):**

ISTA-3130, "Application of Codes Cases," ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."

ISTC-5120, "Motor-Operated Valves," ISTC-5121(a) states, "Active valves shall have their stroke times measured when exercised in accordance with ISTC-3500."

ISTC-3700, "Position Indication Verification," states in part, "Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve position is accurately indicated."

Reason for Request:

NUREG-1482, Rev.1, Section 4.2.5 states in part: "As an alternative to MOV stroke-time testing, ASME developed Code Case OMN-1, 'Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in LWR Power Plants,' which provides periodic exercising and diagnostic testing for use in assessing the operational readiness of MOVs." Section 4.2.5 recommends that the licensees implement ASME Code Case OMN-1 as accepted by the NRC (with certain conditions) in the regulations or RG 1.192, as alternatives to the stroke-time testing provisions in the ASME Code for MOVs. RG 1.192 allows licensees to implement ASME Code Case OMN-1, Rev. 0, (in accordance with the provisions in the regulatory guide) as an alternative to the Code provisions for MOV stroke-time testing in the ASME OM Code 1995 Edition through 2000 Addenda. The Code of record for Salem Fourth 10-Year IST Interval is OM Code-2001 Edition with Addenda through OMB-2003.

Salem Units 1 and 2 Inservice Test Program

Proposed Alternative and Basis for Use:

Pursuant to the guidelines provided in NUREG-1482, Rev.1, Section 4.2.5, Salem proposes to implement Code Case OMN-1, Rev. 0 in lieu of the stroke-time provisions specified in ISTC-5120 for MOVs as well as the position verification testing in ISTC-3700. Code Case OMN-1 has been determined by the NRC to provide an acceptable level of quality and safety when implemented in conjunction with the conditions imposed in RG 1.192.

Using the provisions of this relief request as an alternative to the MOV stroke-time testing requirements of ISTC-5120 and position indication verification of ISTC-3700 provides an acceptable level of quality for the determination of valve operational readiness. Code Case OMN-1 should be considered acceptable for use with OM Code-2001 with OMB-2003 Addenda as the Code of record.

Duration of Proposed Alternative:

The proposed alternative identified in this relief request shall be utilized during the Fourth Ten Year IST Interval

Precedents:

NRC Safety Evaluation for Beaver Valley Power Station, Unit 2, Docket No. 50-412. Regarding the Third 10-Year Interval Inservice Testing Program Relief Requests (TAC Nos. MD5595 – MD5604), February 14, 2008

References:

1. NUREG-1482, Revision 1, Section 4.2.5, "Alternatives to Stroke-Time Testing"
2. Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Table 2, "Conditionally Acceptable OM Code Cases"
3. Code Case OMN-1, Revision 0, "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in LWR Power Plants"

Salem Units 1 and 2 Inservice Test Program

VALVE RELIEF REQUEST – V-06

Proposed Alternative in Accordance with 10CFR50.55a(a)(3)(i)

On the basis that the proposed alternative provides an acceptable level of quality and safety.

Component(s)

Affected: Power-Operated valves (POVs) that are used for system control and have a safety function per ISTA-1100.

**Component/
System Function:**

Various

Applicable Code

Edition and Addenda: ASME OM Code-2001, with Addenda through OMB-2003

Applicable Code

Requirement(s): ISTA-3130, "Application of Codes Cases," ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."
ISTC-5131, "Valve Stroke Time Testing," states in part, "Active valves shall have their stroke times measured when exercised."
ISTC-5132, "Stroke Time Acceptance Criteria," states in part, "Test results shall be compared to the reference value."
ISTC-5133(b), "Stroke Time Corrective Action," states in part, "Valves with measured stroke times that do not meet the acceptance criteria of ISTC-5132 shall be immediately retested or declared inoperable."

Reason for Request:

In NUREG-1482, Revision 1, Section 4.2.9, the NRC staff recommends that licensees should apply ASME Code Case OMN-8, as accepted in RG 1.192, if concerns exist regarding IST of control valves with fail-safe functions. Code Case OMN-8 states that stroke-time testing need not be performed for POVs when the only safety-related function of those valves is to fail safe. Any abnormality or erratic action experienced during valve exercising should be recorded in the test record and an evaluation should be performed. RG 1.192 unconditionally accepts this Code Case for use and allows licensees with an applicable Code of record to implement Code Case OMN-8 without submitting request for relief from their Code of record. The Code of record for Salem Fourth 10-Year IST Interval is OM Code-2001 Edition with Addenda through OMB-2003 and the applicable Code for OMN-8, as stated in the Code Case, is ASME/ANSI OMA-1988, Part 10 through OM Code-1995.

Salem Units 1 and 2 Inservice Test Program

Proposed Alternative and Basis for Use:

Pursuant to the to the guidelines provided in NUREG-1482, Revision 1, Section 4.2.9, Salem proposes to implement Code Case OMN-8 in lieu of the applicable Code provisions for Valve Stroke Testing, Stroke Time Acceptance Criteria and Stroke Test Corrective Action specified in ISTC-5130. Should any abnormality or erratic action be detected an evaluation shall be made regarding need for corrective action. Code Case OMN-8 has been determined by the NRC to provide an acceptable level of quality and safety by its acceptance in RG 1.192.

Using the provisions of this relief request as an alternative to the stroke time requirements specified in ISTC-5130 provides an acceptable level of quality for determining valve operability. Code Case OMN-8 should be considered acceptable for use with OM Code-2001 through OMb-2003 Addenda as the Code of record.

Duration of Proposed Alternative:

The proposed alternative identified in this relief request shall be utilized during the Fourth Ten Year IST Interval.

Precedents:

NRC Safety Evaluation of Relief Requests for the Third 10-Year Interval of the Inservice Testing Program for Hope Creek Generating Station (TAC Nos. MD3300, MD3301, MD3337, MD3338, MD3353, AND MD3354), April 5, 2007

References:

1. Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Table 1, "Acceptable OM Code Cases"
2. Code Case OMN-8, "Alternate Rules for Preservice and Inservice Testing of Power-Operated Valves That Are Used for System Control and Have a Safety Function per OM-10"