

3.1.1.2 Testing at a Refueling Outage Frequency for Valves Tested During Power Ascension

ASME OM Code Subsection ISTC requires that valves tested on a refueling outage frequency be tested prior to returning the plant to operation at power. Several licensees have indicated that certain valves cannot be tested until power ascension begins. This section was included to give guidance for such valves and to indicate that the operability of technical specifications would control the time for testing such valves. It is intended that such valves will be indicated in the IST program as tested on a refueling outage frequency, even though the plant may return to "operation" before the testing is completed. A similar intent applies to valves tested during power ascension from cold shutdowns which are not refueling outages; however, the language in the OM Code is different for valves tested on a cold shutdown frequency.

Before beginning power ascension from a refueling outage, the licensee normally completes the tests of those valves tested at each refueling outage. However, to test any valves that can only be tested during power ascension, the licensee may begin raising the power level and changing modes in accordance with TS requirements and test the applicable valves when plant conditions allow testing. If maintenance has been performed on a valve during the outage, the licensee is required to consider the valve "inoperable" until completing post-maintenance testing in accord with the operability requirements in the TS. This situation could also apply to valves tested during power ascension or at power following a cold shutdown outage.

NRC Recommendation

ASME OM Code Subsections ISTC-3521 and ISTC-3522 requires that all valve testing scheduled for performance during a refueling outage shall be completed before returning the plant to operation. For valves which can only be tested during power ascension, technical specification requirements for the valves or the system determine when the valves are required to be operable. The testing for these valves may be scheduled for refueling outages (or cold shutdown outages) but completed during power ascension from the outage. The NRC has determined that testing of such valves during the plant startup period but prior to reaching steady state full power operation is acceptable without relief .

Basis for Recommendation

The staff has determined that the guidance of this section is consistent with ASME OM Code Subsection ISTC and the TS requirements and is acceptable for meeting those provisions.