

As of: 9/24/15 11:41 AM Received: September 23, 2015 Status: Pending_Post Tracking No. 1jz-8lal-db4x Comments Due: December 02, 2015 Submission Type: Web
--

PUBLIC SUBMISSION

Docket: NRC-2011-0088

Incorporation of American Society of Mechanical Engineers Codes and New and Revised ASME Code Cases

Comment On: NRC-2011-0088-0003

Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases

Document: NRC-2011-0088-DRAFT-0004

Comment on FR Doc # 2015-23193

Submitter Information

Name: Edward Cavey

Address:

13311 Kettler Rd
Needville, TX, 77461

Email: ecavey@tnorthconsulting.com

General Comment

I have worked in the nuclear power industry for 41 years (14 Navy, 27 commercial) and specifically in a lead MOV and IST engineering capacity for the last 25 years.

COMMENT #1:

The proposed 10 CFR 50.55a(b)(3)(ii)(A) "MOV Diagnostic Test Interval" contains the following text:

"...require that licensees evaluate the adequacy of the diagnostic test interval for each MOV and adjust the interval as necessary, but not later than 5 years or three refueling outages (whichever is longer) from initial implementation of ASME OM Code, Appendix III."

For existing plants with mature MOV Programs that are utilizing the JOG Program (ML063490199), most plant MOVs are already on an established periodic verification test interval based on margin and risk per the JOG static test interval matrix. In many cases these test intervals are longer than 5Y/3R. In the NRC SER (ML061280315) for the JOG

Program on page 21 is the following text: "Condition J specified that MOVs with scheduled test frequencies beyond 5 years will need to be grouped with other MOVs that will be tested on frequencies less than 5 years in order to validate assumptions for the longer test intervals. This condition is superceded by the test intervals established by the long-term JOG program." This new NRC rulemaking appears to require operating plants to limit the existing (mature program) MOV periodic verification test intervals to 5Y/3R maximum at the time of implementing Appendix III until "sufficient data exist" to justify longer test intervals. If the intent was for this to apply to new reactors or for new MOVs at existing plants I suggest such clarification be added. There is no benefit nor any evidence of a problem which would warrant this requirement being applied to existing plants with mature MOV programs.

COMMENT #2:

The proposed 10 CFR 50.55a(b)(3)(ii)(D) MOV Stroke Time contains the following text:

"The NRC proposes to add 50.55a(b)(3)(ii)(D) to require that when a licensee applies Paragraph III-3600, "MOV Exercising Requirements," of Appendix III to the OM Code, the licensee verify that the stroke time of the MOV satisfies the assumptions in the plant safety analyses."

One of the advantages of implementing Appendix III is the elimination of stroke time testing. A basic precept of OMN-1 and Appendix III is that stroke time testing is ineffective as a means to accurately assess MOV condition or identify degradation. For the relatively few MOVs which have a specific design basis stroke time requirement, such as a value identified in Technical Specifications(TS), it is expected that plants will still implement a stroke time test at some interval. This test would be a simple go/no-go test to demonstrate stroke times are within TS criteria. Such a test should be a TS surveillance test, not an exam administered by the IST Program. It appears that the intent of this rulemaking is that ALL IST scope active MOVs will still require stroke time testing, and that such testing be required to be administered under the plants IST Program. If so, what acceptance criteria would be applied to this testing? I recommend this be eliminated or at least amended. In reality, the only time a stroke time test for such a purpose would be needed is if the MOV is modified or adjusted in some way that stroke time could be impacted. I believe this deserves to be a new post maintenance or modification requirement rather than a frequent routine exam.