

## Vogle PEmails

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**From:** Hoellman, Jordan  
**Sent:** Monday, February 4, 2019 1:39 PM  
**To:** Vogle PEmails  
**Subject:** Draft PST-ALT-02, Alternative Requirements for Preservice Testing of Class 1 Safety Valves  
**Attachments:** PST-ALT-02 Presubmittal.pdf

Please see the attached draft PST-ALT-02, for discussion at a future public meeting.

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**Subject:** Draft PST-ALT-02, Alternative Requirements for Preservice Testing of Class 1  
Safety Valves  
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<b>Plant Site-Unit:</b>	Vogtle Electric Generating Plant (VEGP) – Units 3 and 4
<b>Interval-Interval Dates:</b>	Applies to the preservice testing period.
<b>Requested Date for Approval:</b>	Approval is requested by August 15, 2019
<b>ASME Code Components Affected:</b>	ASME Class 1 Safety Valves.
<b>Applicable Code Edition and Addenda:</b>	ASME OM Code, 2012 Edition (code of record).
<b>Applicable Code Requirements:</b>	ASME OM Code, I-7210 requires Class 1 safety valve testing within 6 months before initial reactor criticality, each valve shall have its set-pressure verified. Set-pressure verification shall be determined by pressurizing the system up to the valve set-pressure and opening the valve, or the valve may be tested at or below normal system operating pressures with an assist device.
<b>Reason for Request:</b>	<p>The existing Code Requirement implies that the safety valves be tested in place. Due to the location of the valves on top of the pressurizer, this is a personnel safety issue based on the temperature environment when the valves would be tested, if the assist device is used, or to install a gag on the valve not being tested.</p> <p>Also, the timing requirement of within 6 months before initial criticality provides potential scheduling issues. If the 6 months expires just before initial criticality, the plant would be in a hot, pressurized condition, and would have to be cooled down and depressurized to replace the valves. Tying testing to the fuel load milestone is favorable because potential delays that push the fuel</p>

	<p>load date outside of the proposed 3 month test requirement, the plant conditions would be in a cold and depressurized condition, and the valves could be removed and replaced without having to put a thermal cycle on the plant, and the associated time delays of cooling down/depressurizing and subsequent return to normal operating temperature and pressure.</p> <p>Per discussions with the Appendix I Sub-Group, the purpose of this requirement is to ensure the plant is started up with safety valves with recently verified setpoints, and to ensure that valves do not go an excessive time prior to retesting, if initial startup is prolonged. Additionally, they believe that I-7210, was not meant to preclude the use of pretested valves. The use of pretested valves is allowed per I-1320 in-lieu of in place testing for routine inservice testing.</p>
<p><b>Proposed Alternative and Basis for Use:</b></p>	<p><b>Proposed Alternative:</b></p> <p>Class 1 Safety Valves shall be replaced with Pretested valves. The set-pressure test of the valves shall not be more than 3 months prior to the commencement of Initial Fuel loading. The initial testing per I-1320, shall be no longer than 24 months from date of the set-pressure verification test.</p> <p><b>Basis for Use:</b></p> <p>The proposed alternative provides an equivalent level of safety as it ensures the safety valves setpoints will be verified recently prior to beginning of the fuel loading and subsequent initial startup activities, and that inservice valve testing is not extended past the normal frequency, even if the startup process prior to Initial Generation of Electricity by nuclear heat is prolonged. This alternative provides the additional benefit of improving personnel safety by not having personnel in a heat stress environment to perform in-place testing.</p> <p>Since the proposed alternative is consistent with inservice testing requirements for replacing with pretested valves in accordance with I-1320(b) and the frequency of the first inservice test limits the amount of time between set-pressure verification test, this proposed alternative provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1).</p>

ND-19-0060

Enclosure

Proposed Alternative VEGP 3&4-PST-ALT-02 in Accordance with 10 CFR 50.55a(z)(1) –  
Alternative Requirements for Preservice Testing of Class 1 Safety Valves

<b>Duration of Proposed Alternative:</b>	Preservice testing conducted prior to commercial operation.
<b>References:</b>	None.
<b>Status:</b>	Awaiting NRC authorization

DRAFT