

NRC STAFF
GUIDELINES FOR EXCLUDING EXERCISING
(CYCLING) TESTS OF CERTAIN VALVES
DURING PLANT OPERATION

Any valve which when exercised (cycled) could put the plant in an unsafe condition should not be tested. Below are some examples of the types of valves that should be specifically excluded from exercising (cycling) tests during plant operation*:

1. All valves whose failure in a non-conservative position during the cycling test would cause a loss of system function should not be exercised. Valves in this category would typically include all non-redundant valves in lines such as a single discharge line from the refueling water storage tank, or accumulator discharge lines in PWR's and the HPCI turbine steam supply and the HPCI pump discharge in BWR's. Other valves may fall into this category under certain system configurations or plant operating modes. For example, when one train of a redundant system such as ECCS is inoperable, non-redundant valves in the remaining train should not be cycled since their failure would cause a loss of total system function.
2. All valves, whose failure to close during a cycling test would result in a loss of containment integrity. Valves in this category would typically include all valves in containment penetrations where the redundant valve is open and inoperable.
3. All valves, which when cycled, could subject a system to pressures in excess of their design pressures. It is assumed for the purpose of a cycling test, that one or more of the upstream check valves has failed unless positive methods are available for determining the pressure or lack thereof on the high pressure side of the valve to be cycled. Valves in this category would typically include the isolation valves of the residual heat removal/shutdown cooling system and, in some cases certain ECCS valves.

*All ASME Section XI Category A and B valves should be cycled, as practicable, at each cold shutdown, but need not be cycled more often than once every 3 months.

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1484 160

d. For Valve Testing; identify:

- i) each valve in ASME Section XI Categories A & B that will be exercised every 3 months during normal plant operation (indicate whether partial or full stroke exercise).
- ii) each valve in ASME Section XI Category A that will be leak tested during refueling outages.
- iii) all valves in ASME Section XI Categories C, D, and E, that will be tested, the type of test and the test frequency. For check valves, identify those that will be exercised every 3 months and those that will only be exercised during cold shutdown.

APPENDIX B

INFORMATION REQUIRED FOR NRC REVIEW OF REQUESTS FOR RELIEF FROM
ASME CODE SECTION XI REQUIREMENTS DETERMINED TO BE IMPRACTICAL

1. Identify component for which relief is requested:
 - a. Name and number as given in FSAR
 - b. Function
 - c. ASME Section III Code Class
 - d. For valve testing, also specify the ASME Section XI valve category as defined in IWV-2000.
2. Specifically identify the ASME Code requirement that has been determined to be impractical for component.
3. Provide information to support the determination that the requirement in (2) is impractical; i.e., state and explain the basis for requesting relief.
4. Specify the inservice inspection (or testing) that will be performed in lieu of the ASME Code Section XI requirements that have been determined to be impractical.
5. Provide the schedule for implementation of the procedure(s) in (4) above.