



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 9, 2021

MEMORANDUM TO: Heather M. Jones, Chief  
Reactor Inspection Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

FROM: Douglas R. Bollock, Senior Reactor Operations Engineer /RA/  
Reactor Inspection Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF DECEMBER 8<sup>th</sup>, 2020, PUBLIC MEETING TO DISCUSS  
LESSONS LEARNED FROM IMPLEMENTATION OF POWER-OPERATED  
VALVE INSPECTIONS

On December 8<sup>th</sup>, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20342A041), the Office of Nuclear Reactor Regulation staff hosted a Category 2 public teleconference and webinar with representatives from the Nuclear Energy Institute (NEI), various licensee staff, and members of the public to share the findings and lessons learned while implementing inspection procedure (IP) 71111.21N.02 "Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements" or power-operated valve (POV) inspections in 2020.

During the meeting, the NRC staff presented an overview of POV inspection implementation over the course of 2020, and then focused on 14 findings and lessons learned identified while implementing the POV inspections (ADAMS Accession No. ML20338A012). NRC staff provided background on each lesson learned and answered questions from industry personnel on a number of issues.

Most of the questions and answers were regarding supplemental valve position indication requirements. The NRC staff discussed that the licensees have to perform the supplemental valve position indication testing in accordance with section ISTC-3700 of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code. Industry also asked if concurrent testing for supplemental valve position indication testing is required, to which the NRC staff responded no, concurrent testing is not required as allowed by ISTC-3700. The NRC staff discussed when compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(b)(3)(xi) is required and the frequency of the supplemental testing. NRC staff stated that the 2017 rule condition requiring supplemental testing in accordance with ISTC-3700 was to become effective when updating licensee's inservice testing (IST) program to the 2012 Edition of the OM Code. Additionally, ISTC-3700 requires valve position testing every 2 years and the (b)(3)(xi) condition applies when the ISTC-3700 test is performed (2 years from the previous test). Industry representatives stated that they did not agree with the NRC staff position and that they believed the next ISTC-3700 test was to be performed within 2 years from updating their IST program to the 2012 Edition of the OM code. NEI and industry representatives presented slides with their position as well as provided general feedback on POV inspection

implementation (ADAMS Accession No. ML21003A009 and ML21003A008). The NRC staff shared that this question and answer was specifically addressed in the rulemaking process (the package can be found in ADAMS Accession No. ML16130A531), which specifically stated the 2 year performance did not begin after updating to the 2012 Edition of the Code and therefore the NRC position was finalized in the 2017 rulemaking. The NRC staff and industry representatives discussed a few examples of when testing was required. The NRC staff also discussed with industry that the NRC is open to the option of requesting relief to extend testing beyond the 2 years and additional grace period allowed by the ASME code if that was in the best interest of safety of the plant and valves in question. NRC management committed to discuss the supplemental position indication testing topic and any outstanding questions from industry again during the next monthly ROP public meeting in 2021.

This meeting was a teleconference and webinar meeting. At designated points during the meeting, members of the public were invited to provide any comments on the presentations.

Enclosure:  
Lists of Attendees

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SUBJECT: SUMMARY OF DECEMBER 8<sup>th</sup>, 2020, PUBLIC MEETING TO DISCUSS  
LESSONS LEARNED FROM IMPLEMENTATION OF POWER-OPERATED  
VALVE INSPECTIONS DATED FEBRUARY 8, 2021

**DISTRUBTION:**

RidsNrrDroIrib Resource

**ADAMS Accession Nos.: ML2121041A409**

<b>OFFICE</b>	NRR/DRO/IRIB	NRR/DRO/IRIB (BC)
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