From: Jeffrey.D.Stumb@dominionenergy.com
To: RulemakingComments Resource
Cc: Wolfgang, Bob; Scarbrough, Thomas
Subject: [External_Sender] Docket ID NRC-2018-0290
Date: Thursday, May 20, 2021 11:15:51 AM
Attachments: JStumb Comments on NRC-2018-0290.pdf

NRC Staff,

I attempted to upload my comments at regulations.gov, but I received an error message upon uploading my comment file. Please reference my comments on Docket ID NRC-2018-0290 attached to this email. Feel free to reach out to me if there are any questions regarding my input.

Thank you,

Jeff Stumb
Innsbrook - 3NW
Cell Phone → 703-928-1983

May 20, 2021

Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Public Comments on "American Society of Mechanical Engineers 2019 - 2020 Code Editions Incorporation by Reference" [RIN 3150-AK22; Docket ID NRC-2018-0290]

10 CFR 50.55a(b)(3)(xi) OM Condition: Valve Position Indication

This condition is applicable when implementing the 2012 or later editions of the ASME OM Code. This requirement stipulates that licensees shall verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation, to provide assurance of proper obturator position.

In the last rulemaking, 10CFR50.55a(b)(3)(xi) was updated to increase the scope of the OM condition to include valves covered in all of the mandatory appendices within the ASME OM Code. This change also allows other test methods and frequencies used in Subsection ISTC and the mandatory appendices to verify obturator position on a test interval longer than every two years as prescribed by ISTC-3700.

Establishing a requirement to verify obturator position on every valve in the IST program with remote position indication can place a significant burden on the licensee to develop new test methods and procedures for valves that do not have supplemental means available, such as flow or pressure indication. In these cases, it may be necessary to purchase special equipment and deploy personnel to high radiological areas to verify obturator position on a frequency that may not add any increase in safety.

Recently, utilities have received NRC approval to use performance-based test methods, such as the 10 CFR 50 Appendix J test program, to verify obturator position. Performance-based test programs allow for valves to be tested at frequencies greater than every two years and require more frequent testing for poor performing valves. Other performance-based test programs include OM Code Cases OMN-23 and OMN-27, as well as the Check Valve Condition Monitoring program in Mandatory Appendix II, the inservice (diagnostic) test on motor-operated valves in Mandatory Appendix III, and the performance assessment test on air-operated valves in Mandatory Appendix IV.

The NRC expectations versus what is required in this condition is confusing. ISTC-3700 prescribes the position indication test be performed on a 24M frequency and the supplemental position verification test prescribed by this condition can be performed at a 24M frequency or "other verification methods and frequencies". Is prior NRC approval required to deviate from the 24M frequency for obturator verification when using the performance-based Appendix J test program? The condition states that other verification methods and frequencies within Subsection ISTC and its mandatory appendices can be used to verify obturator position. The 10 CFR 50 Appendix J test program is prescribed in Subsection ISTC, but the NRC has also stated in a recent public meeting that prior NRC approval would be needed to credit the verification methods and frequencies from the Appendix J program.

If the NRC currently believes that prior NRC approval is required to use performance-based test methods and frequencies for supplemental obturator position verification then the OM condition could be modified to allow performance-based test methods to verify obturator position while still maintaining reasonable assurance of the valve condition. The NRC staff should not be concerned with the performance history on specific valves within the scope of performance-based test programs since this type of test program requires more frequent testing for poor performance and valve degradation. Performance-based test programs provide the reasonable assurance necessary to meet the intent of this OM condition on a frequency greater than every two years and would greatly reduce the burden on the licensee and the NRC staff.

It is recommended that the following wording be used to enhance the condition to provide greater flexibility in how licensees meet the intent of this OM condition:

When implementing paragraph ISTC–3700, ''Position Verification Testing,'' in the ASME OM Code, 2012 Edition through the latest edition of the ASME OM Code incorporated by reference in paragraph (a)(1)(iv) of this section, licensees must verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation to provide assurance of proper obturator position for valves with remote position indication within the scope of ~~Subsection ISTC including its mandatory appendices~~ the ASME OM Code and its performance-based verification methods and frequencies. For valves not susceptible to stem-disk separation, the supplemental position verification testing specified in ~~paragraph ISTC- 3700~~ this condition may be performed based on guidance in Code Case OMN-28. ~~on a 10-year interval where the licensee documents a justification, which is made available for NRC review, demonstrating that the stem-disk connection is not susceptible to separation based on the internal design and evaluation of the stem-disk connection using plant-specific and industry operating experience and vendor recommendations.~~

This change allows for the supplemental position obturator verification test to be credited by existing performance-based test methods and frequencies such as 10 CFR 50 Appendix J, Code Cases OMN-23 and OMN-27, and performance-based testing in Mandatory Appendices II, III and IV.

10 CFR 50.55a(f)(4), Inservice Testing Standards Requirement for Operating Plants

The proposed rulemaking currently deletes the phrase "...*without requesting relief under paragraph (f)(5) of this section or alternatives under paragraph (z) of this section*." This deletion implies that there may be some cases where non-Code Class components will require prior NRC approval to deviate from ASME OM Code requirements. Licensees currently have justifications for non-Code Class components justifying that Code deviations demonstrate an acceptable level of quality and safety, or that implementing the Code provisions would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. The NRC staff will need to provide examples of when prior NRC approval would be required and when prior NRC approval would not be required prior to implementing this change in order for licensees to determine if the currently implemented justifications need prior NRC approval and allow the NRC staff adequate time to review any needed requested alternatives.

10 CFR 50.55a(f)(7), Inservice Testing Reporting Requirements

The proposed 10 CFR 50.55a(f)(7) wording would expand the requirement of licensees to submit their IST Plans and interim IST Plan updates related to pumps and valves, and IST Plans and interim Plan updates related to snubber examination and testing to the NRC when the final safety analysis report for the applicable nuclear power plant is updated. Submittal of interim IST Plan updates for pumps and valves and snubber examination and testing is not currently required. The new requirement to submit IST Plan updates to the NRC is considered unnecessary and overly burdensome. Currently, program plans associated with the ASME OM Code are submitted to the NRC for information prior to the beginning of each 10-year interval. These program plan submittals are deemed adequate for the NRC to perform their technical reviews of any associated alternative and relief requests.

The current revision of the ASME OM Code IST program Plans are available to onsite resident inspectors, who can provide the latest revision to interested NRC technical staff and regional inspectors upon request. Furthermore, NRC inspectors typically request licensees to either provide, or have available upon arrival, the latest Plan documents prior to scheduled inspections. An OM Code IST program Plan is considered a living document and could go through several revisions within a 10-year interval. The proposed requirement may result in licensees not updating their ASME OM Code program plans as often due to the extra burden of having to send revisions to the NRC.

In summary, since the NRC Resident Inspector currently has access to the most recent revision of a licensee's ASME OM Code program Plan and is able to distribute them to others within the NRC organization upon request, it is recommended that the additional proposed requirement to submit interim IST Plan updates be deleted.

I hope that the NRC staff find these comments helpful and informative.

Sincerely,

Jeffrey Stumb