

# NRC INSPECTION MANUAL

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## PART 9900: TECHNICAL GUIDANCE

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STS451.TG

### STANDARD TECHNICAL SPECIFICATIONS (BWR) SECTION 4.5.1

#### A. PURPOSE

To provide guidance on Standard Technical Specifications (STS) Section 4.5.1 as it relates to verifying valve positions, as provided in an NRR memorandum dated August 21, 1985.

#### B. BACKGROUND

The licensee at the Susquehanna Steam Electric Station (SSES) used control room position indicating lights instead of local valve position indication to satisfy the surveillance requirements of SSES Technical Specification Section 4.5.1 (Item 3b(1)). This technical specification requires periodic verification that certain valves in the emergency core cooling system flow path are in their correct position. In an April 17, 1985 memorandum to NRR, J. G. Partlow requested an interpretation of the intent of the technical specification requirement with regard to the use of local or remote position indication.

#### C. DISCUSSION

The intent of the surveillance requirement relating to valve position verification is to assure that valves in the flow path for systems such as the emergency core cooling systems are in their correct position such that the system would not be rendered inoperable due to a mispositioned valve. For valves which have remote position indicating lights in the control room, the remote position indication may be used to verify that valves are in the correct position.

It was not the intent of the SSES technical specification surveillance requirement nor the STS surveillance requirement (section 4.5.1) that only local valve position indication be used. The potential that the remote position indication would not be in agreement with the actual valve position should be small. Concerns for these types of failures are addressed by surveillance requirements which verify that there are no obstructions in the flow path or by other maintenance or test procedures which would verify the

operability of the remote position indication. These specific technical specification requirements are part of the inservice inspection requirements of Section XI of the ASME Boiler and Pressure Vessel Code. Article IWV-3300 requires that valves with remote position indication be observed at least once every 2 years to verify that valve operation is accurately indicated.

D. CONCLUSION

At the request of NRR, the Nuclear Safety Information Center searched the Sequence Coding Search System data base for licensee event reports concerning problems with valve position indication. Based on a review of the results of this search, NRR concluded that the frequency of incorrect valve position indication events (i.e., indication of a valve as open when it is closed or vice versa) is too low to justify recommending a technical specification interpretation that would rely on just local valve indication.

E. REFERENCE

The guidance provided in this directive was extracted from a memorandum from Hugh L. Thompson, Jr., Director, Division of Licensing, NRR, to James G. Partlow, Director, Division of Inspection Programs, IE, dated August 21, 1985, subject: Technical Specification Interpretation. The complete memorandum is in the Document Control System (DCS microfiche #68036-218).

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