
Reply: It is the opinion of the Committee that the following alternative may be used.

Applicability: See Applicability Index.

1 TEST FREQUENCIES, CLASS 1 PRESSURE RELIEF VALVES

(a) 72-Month Test Interval. Class 1 pressure relief valves and PWR Main Steam Safety Valves shall be tested at least once every 72 months (6 yr), starting with initial electric power generation. A minimum of 20% of the valves from each valve group shall be tested within any 24-month interval. This 20% shall consist of valves that have not been tested during the current 72-month interval, if they exist. The test interval for any individual valve that is in service shall not exceed 72 months except that a 6-month grace period is allowed to coincide with refueling outages to accommodate extended shutdown periods for ASME OM Code 2015 Edition and prior. For ASME OM Code 2017 Edition and later, ISTA-3170 may be utilized to accommodate extended shutdown periods.

(b) Replacement With Pretested Valves. The Owner may satisfy testing requirements by installing pretested valves to replace valves that have been in service, provided that

(1) for replacement of a partial complement of valves, the valves removed from service shall be tested prior to resumption of electric power generation and shall be subjected to the maintenance specified in subpara. (d) or

(2) for replacement of a full complement of valves, the valves removed from service shall be tested within 24 months of removal from the system.

(c) Requirements for Testing Additional Valves. Additional valves shall be tested in accordance with the following requirements:

(1) For each valve tested for which the as-found set-pressure (first test actuation) exceeds the greater of either the plus/minus tolerance limit of the Owner-established set-pressure acceptance criteria or ±3% of valve nameplate set-pressure, two additional valves shall be tested from the same valve group.

(2) If the as-found set-pressure of any of the additional valves tested in accordance with subpara. (c)(1) exceeds the criteria noted therein, then all remaining valves of that same valve group shall be tested.

(3) The Owner shall evaluate the cause and effect on system capability of valves that fail to comply with the set-pressure acceptance criteria established in subpara. (c)(1), or the acceptance criteria for other required tests (e.g., acceptance of auxiliary actuating devices, compliance with Owner’s seat tightness criteria). Based upon this evaluation, to address any generic concerns, the Owner shall determine the need for testing in addition to the minimum tests specified.

(d) Maintenance. The Owner shall disassemble and inspect each valve after as-found set-pressure testing to verify that parts are free of defects resulting from time-related degradation or service-induced wear. Based upon this inspection, the owner shall determine the need for additional inspections or testing to address any generic concerns. As-left set-pressure testing shall be performed following maintenance and prior to returning the valve to service.

(e) Disassembly and Inspection. Each valve shall have been disassembled and inspected in accordance with subpara. (d) above prior to the start of the 72-month test interval. Disassembly and inspection performed prior to the implementation of this Code Case may be used.