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June 15, 2000

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Ms Annette L. Vietti-Cook
Secretary of the Commission
Attn: Rulemakings and Adjudications Staff
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE **PR 2150.52 54+100**
(65 FR 11488)

Subject: ASME Comments on Advanced Notice of Public Rulemaking (ANPR) entitled "Risk-Informing Special Treatment Requirements", in Federal Register, March 3, 2000 (Volume 65 Number 43)

Dear Ms. Vietti-Cook:

The ASME Board on Nuclear Codes and Standards (BNCS) created a Task Group on Risk-Informed Part 50 to address its interests in the risk-informing of 10 CFR Part 50. This Task Group represents the leadership of the nuclear codes and standards sector of the ASME, which developed the technical comments shown below. These comments are submitted as a constructive public service for the purpose of improving future revisions of the subject document. In the time frame available for review and comment, the opinions and comments generated, by necessity, represent those of the reviewers rather than that of the ASME.

Overall: The ASME does support the NRC initiative to risk-inform Part 50 and feels that the proposed 50.69 (special treatment requirements) / Appendix T (risk-ranking requirements) is a viable way to promulgate these requirements.

Risk-Ranking: Although the draft version of Appendix T appears to be a reasonable set of requirements, those requirements may need to be modified with the passage of time and accumulated experience. Many of those requirements appear to be similar to those in the ASME OMN-3 Code Case and the ASME B&PV N-560 / N-577 / N-578 Code Cases. It would be more appropriate to reference those Codes Cases, thereby avoiding these detailed requirements in Appendix T.

In addition, plant probabilistic risk assessment (PRA) models traditionally only include a limited representation of failure modes for pressure boundary components, such as those associated with loss-of-coolant accident, steam and feedwater-line-break initiating events. The ASME has worked with industry and NRC over the past several years to develop methods for explicitly gaining insights from the PRA models to be integrated with other piping failure likelihood information in categorizing plant piping segments for risk-informed inservice inspection. The above-mentioned Code Cases N-560, N-577, and N-578 define the approaches for various scopes of piping systems based on Code classification.

Recognizing the need to Risk-Inform the Special Treatment for all pressure boundary components and associated structures, ASME is initiating an effort to develop an additional Code Case(s) to determine approaches for applying plant PRAs for these additional SSCs. This Code Case(s) could be referenced by the NRC to supplement Appendix T in defining methods for risk-ranking of SSCs associated with the pressure boundary, thereby significantly enhancing the benefits of risk-informed regulation.

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Special Treatment: Since no draft version of 50.69 has yet been promulgated for comment, it can only be assumed that a set of requirements will appear in the future addressing the wide variety of Part 50 technical areas listed in the ANPR. Since the ASME has already issued code cases for RI-IST (risk-informed inservice testing) and RI-ISI (risk-informed inservice inspection), it would appear reasonable for 50.69 to reference those code cases for the risk-informed requirements in those technical areas. 50.69 can also reference the Special Treatment defined in new Code Cases that are being developed to address SSCs beyond those already addressed above.

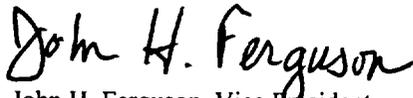
ASME is developing a B&PV Section XI Code Case to vary the special treatment requirements for repair/replacement/modification activities according to the safety significance of items categorized by the processes discussed above. Such a Case would be an effective mechanism for utilities and the NRC to implement consistent application of special treatment requirements across the industry. This project will likely be complete within a year.

Terminology: Since substantial effort has already been expended in the development and publishing of ASME Code Cases (as well as NRC Regulatory Guides), it would seem that the terminology that the industry has agreed to use should continue to be consistently utilized. The ASME Code Cases (and the NRC Regulatory Guides) use terms High / Low Safety Significant Components vice Safety Significant Components / Low Safety Significant Components (as used in the ANPR).

The ASME supports a cooperative team effort between the NRC, ASME, and NEI for the development of these technical requirements. Should the NRC have informal questions on these comments, please direct them to the Chairman of our ASME Risk-Informed Part 50 TG, C. Wesley Rowley, at 918-299-0255. Otherwise, please direct them to me care of:

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Sincerely Yours,



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