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ADJUDICATIONS STAFF

The following are my comments on the proposed rule incorporating the 2000 Addenda of the ASME Boiler and Pressure Vessel Code Section XI.

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2.2.1 Owner-Defined Requirements for Class CC and Class MC Components (Including 2.2.1.1, 2.2.1.2, 2.2.1.3, 2.2.1.4)

I believe that these limitations are necessary. It is inappropriate for ASME to leave the general and detailed visual examination requirements unspecified.

2.2.3 Acceptance Standard for Surfaces Requiring Augmented Ultrasonic Examinations

I completely disagree with this meaningless limitation. The proposed limitation is technically unsound and is in conflict with the endorsed provisions of IWE-3122.4. The 1995 Addenda revision by ASME is technically sound. The nominal thickness of a concrete containment liner is based solely on constructability and largely on the thickness needed for the liner to act as a form during concrete pouring. It has nothing to do with the thickness needed during operation. The liner carries no tensile stress and can therefore degrade to less than 1% of the nominal thickness with no degradation of containment effectiveness. Therefore, degradation of 10% of the nominal thickness is totally irrelevant and insignificant to safety. IWE-3122.4 allows degradation that satisfies the requirements of the Design Specification without any additional evaluation. All liner degradation that is not through-wall meets this criteria. Therefore, the proposed limitation is meaningless.

The NRC is arguing against reducing a requirement that has been shown to be unnecessary. The NRC has provided no technical basis for retaining this requirement. The NRC staff appears to be reluctant to delete any requirement, just because it is there, even if there is no proven safety benefit to the requirement, and regardless of its cost and effects on exposure to personnel. Engineering is a science based on experience. The NRC staff should be willing to accept modifications to industry practice, based on the knowledge that we have gained from our experience. It is incumbent on the NRC to demonstrate that there is a safety basis to support retention of this requirement that has been proven, by thirty years operating experience, to be costly and unnecessary. The NRC is required to accept industry Codes and Standards, unless their requirements are contrary to public health and safety. The NRC staff not shown that this industry-endorsed change is contrary to public health and safety.

2.2.6 Substitution of Alternative Methods

I disagree with this limitation. I believe that the NRC is reading the revised Section XI requirements incorrectly. The proposed limitation is based on concerns that "there are examination coverage, volume, flaw acceptance, and qualification requirements related to these respective methods that are outside the scope of an ANI's responsibility." I assert that the revised requirements do not allow any changes (i.e., reductions) in examination coverage, volume, flaw acceptance, and qualification requirements. I don't understand why the NRC thinks that the Code permits such changes. This concept is no different than that in the provisions of IWA-2240 endorsed by the NRC since the 1974 Edition. This concept has worked for 26 years, without any problems. There is no reason not to expand the concept to examinations performed in the course of repair/replacement activities.

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2.2.7 System Leakage Tests

I disagree with this limitation. The NRC appears to be ignoring the simple fact that the deletion of the hold time applies only to periodic system pressure tests during operation, and is specifically prohibited from being applied to repair/replacement activities. The hold times are unnecessary for systems that have been in operation, because they have been subjected to an extended "hold time" of a refueling cycle or an inspection period. I don't understand why the NRC would want to add an additional ten minutes or four hours to the operational "hold times" of one to three years.

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2.2.8 Table IWB-2500-1 Examination Requirements

I disagree with these limitations. In all cases, the NRC is arguing against reducing requirements that have been shown to be unnecessary. The NRC has provided no technical basis for retaining these requirements. The NRC staff appears to be reluctant to delete any requirement, just because it is there, even if there is no proven safety benefit to the requirement, and regardless of its cost and effects on exposure to personnel. Engineering is a science based on experience. The NRC staff should be willing to accept modifications to industry practice, based on the knowledge that we have gained from our experience. It is incumbent on the NRC to demonstrate that there is a safety basis to support retention of these requirements that have been proven, by thirty years operating experience, to be costly and unnecessary. The NRC is required to accept industry Codes and Standards, unless their requirements are contrary to public health and safety. The NRC staff not shown that these industry-endorsed changes are contrary to public health and safety.

The Class 1 nozzle inner-radius examinations were put in Section XI in 1970 because they had a high stress-concentration factor and the Committee had no service experience to

justify not performing the examination. Today, we have thirty years more experience of operating these nozzles and have found that no failures or degradation are occurring in this area. Thirty years of experience with no failures seems to be adequate justification for eliminating a requirement that causes significant radiation exposure to plant personnel and has a high economic cost to the plant Owner.

The Class 1 CRD bolting requirement has likewise proven to be unnecessary. The NRC argument that "Inservice examination of bolting to be reused is appropriate in order to verify that service-related degradation of components is not occurring," is unfounded, because 30 years of experience has shown that no such degradation is occurring. The NRC argument that "Inservice examination of bolting to be reused is appropriate in order to verify that ... the bolting was not damaged during the maintenance activity," is unfounded, because the postulated damage would have no effect on the structural integrity of the bolted joint.

The Class 1 vessel skirt attachment limitation is similarly unnecessary. Again, 30 years of experience has shown the two-sided examinations to be unnecessary. The Code examination reduction is necessary because both sides of the weld are generally not accessible. If weld degradation were occurring, it would probably penetrate the weld in a small area and become detectable from the opposite side.

4. Withdrawal of a Proposed Rule To Eliminate 120-Month Update

I support the NRC decision to withdraw the proposed rule to delete the 120-month update. Periodic updates to later Editions and Addenda of Section XI are necessary to keep inservice inspection up to date with current technology, and are often of benefit to Owners in reduction of unnecessary burden and reduction of personnel exposure (if the staff doesn't impose unnecessary limitations).

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