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OFFICE OF SECRETARY
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October 16, 2001

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemaking and Adjudications Staff

SUBJECT: Comments on NRC Proposed Changes to 10 CFR 50.55a (Federal Register Volume 66 Number 150 dated August 3, 2001)

Dear Secretary:

The subject amendments to 10 CFR 50.55a *Industry Codes and Standards* present a significant impact to the industry in the subject of NDE personnel certification. The limitations to Section XI of ASME Code in the proposed rule will impose an unreasonable burden and are not technically justifiable. The purpose of providing these comments is to inform the regulators of the significance of the impact of the proposed rule and to offer alternatives that will enable cost-effective implementation.

Sincerely,

Jack Spanner, Jr.

Enclosure

Template = SECY-067

SECY-02

Paragraph	Comment	Proposed Revision
(b)(2)(xviii) (A) IWA-2314	<p>The recertification requirement for Level I and II personnel was revised from three to five years to provide consistency with the Level III 5 year recertification period. It does not make sense for Level III personnel that perform examinations extensively to requalify less often than Level II personnel that also perform examinations primarily. There is no data to support that 5 year recertification will decrease the proficiency of NDE personnel. In fact the opposite is true. Since Level III recertification was extended to 5 years in 1989 (1980 in ASNT Level III program) there is no data to support that a decrease in proficiency has resulted. There is little or no technical basis for 3 year recertification. Granted, proficiency may decrease over time if personnel do not continually perform examinations, but this situation is considered in ANSI/ASNT CP-189 and SNT-TC-1A. A recent study has shown that NDE personnel are leaving the nuclear industry partially because of the extensive qualification testing that is required. Requiring all NDE personnel to recertify every five years will help alleviate this concern and increase the future nuclear NDE workforce. Could not find the reference: "American Society for Nondestructive Testing Control Certifications Program"</p>	<p>Delete this modification and leave IWA 2314 (a and b) as is.</p> <p>Reference to ASNT Control Certifications Program should probably be ASNT Standard for Qualification And Certification of Nondestructive Testing Personnel (ANSI/ASNT CP-189)</p>
(b)(2) (xviii) (B) IWA-2316	<p>This alternative to certifying personnel to perform VT-2 inspections has already been approved by the NRC for several licensees. Using this alternative qualification provision has not resulted in unreliable VT-2 examinations nor a decrease in safety. VT-2 Leak testing is a very straightforward technique and no value is added to the certification process by requiring VT-2 plant personnel to meet the same standards as other NDE personnel. This alternative certification process is provided for plant personnel whose normal job function includes detection of leakage. They are more familiar with the plant systems and have more experience looking for leaks than most NDE personnel. Therefore, they are less likely to not detect a leak and receive little or no benefit from being required to meet the more strenuous requirements of other NDE personnel.</p>	<p>Delete this supplement to the alternative qualification provisions for VT-2 personnel that requires initial and recertification examinations.</p>

(b)(2) (xviii) (C) IWA-2317	This alternative to certifying personnel to perform VT-3 inspections has already been approved by the NRC for several licensees. Using this alternative qualification provision has not resulted in unreliable VT-3 examinations. VT-3 is a very straightforward technique and no value is added to the certification process by requiring VT-3 plant personnel to meet the same standards as other NDE personnel. This alternative certification process is provided for plant personnel whose normal job function includes detection of mechanical damage. They are more familiar with the plant systems and have more experience looking for damage than most NDE personnel. Therefore, they are less likely to not detect a problem and receive little or no benefit from being required to meet the more strenuous requirements of other NDE personnel.	Delete this supplement to the alternative qualification provisions for VT-3 personnel that requires initial and recertification examinations.
(b)(2) (xix) IWA—224 0 IWA-4520 (c)-	There are many aspects involved with substituting alternative examination methods for those specified in the Construction Code as noted in paragraph 2.2.6 of the Proposed Rule. Requirements related to examination coverage, volume, flaw acceptance and qualification are important and the demonstration for the ANII should consider these. IWA-2110 and NCA-5000 say that these requirements are the responsibility of the ANII and ANI to review as well as the NDE Level III. These requirements should also be considered in the Owner's Repair/Replacement Program. Utilities have been using IWA-2240 to examine components with new techniques that are demonstrated to be equivalent or superior to those specified by the Code. It is not understood why the NRC has recently started taking exception to a Code requirement that they have approved in older Editions of Section XI.	Delete this limitation to the implementation of IWA-2240 and 4520-(c).

<p>(b)(2)(xxii) App. VII-4240</p>	<p>Changing the Appendix VII-4240 reference from 1999 and 2000 Addenda to the 1998 Edition would change the current 8 hours of annual practice (detecting, sizing and interpreting UT data) back to 10 hours of annual (classroom) training and would render the VII-4240 requirements ineffective. The Code was changed to improve the effectiveness of VII-4240 by changing it to require practicing the skill of ultrasonic detecting, sizing and interpreting data 8 hours annually. The Code was revised to allow manual or automated system personnel to practice data analysis using welds and components containing the in-service induced flaws of interest. Computer based training systems have been developed that use pre-recorded flaw data to train manual UT examiners. In a virtual environment manual inspection personnel can practice scanning and analyzing UT data. The Code revision was specifically written to include manual scanning, automated systems, and computer based systems for manual or automated scanning practice when the UT signals are obtained from flaws of interest. It is believed that this is more beneficial than classroom training that would not maintain the data analysis skills of UT personnel. As currently proposed UT personnel will be required to take 8 hours of annual practice within 6 months of a refueling outage in accordance with 10 CFR 50.55a(b)(2)(xiv) and 10 hours of annual training in accordance with Section XI. The 10 hours of annual training would be of little value and would be an unnecessary burden. There is also confusion concerning the ability to apply the 8 or 16 hours of annual practice to the 8/10 hours of annual practice/training.</p>	<p>Delete the limitation to (b)(2)(xxii). Annual Training Requirements for Ultrasonic Examiners must be in accordance with VII-4240 1999-2000 Addenda. Computer based training systems that use pre-recorded flaw data may be used by personnel training for manual or automatic examinations. Personnel meeting the annual practice requirements of VII-4240 may apply those 8 hours to the 8 hours required within 6 months of a refueling outage as contained in 10CFR50.55a(b)(2)(xiv).</p>
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