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STPNOC Comments on NRC Proposed Rulemaking
on 10CFR50.55a, August 3, 2001
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Comments on Proposed 10 CFR 50.55a Rule

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Comment Number	Page	Paragraph	Comment ¹	Proposed Revision ²
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¹ The comment should clearly explain the concern and provide references when appropriate
² Proposed Revision should provide the replacement wording, unless the recommendation to delete existing wording is recommended
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1		50.55a(b)(2)(xii)(B)	<p>Piping outside the scope of Section XI, by definition, has no safety significance that would require inspection or testing to verify structural integrity, pressure integrity, or operational readiness. Containment penetrations of such piping are required to be classified as Safety Class 2 in recognition of its function of providing containment integrity. These Class 2 components in non-classed systems are subject to local leak rate testing (LLRT) under 10CFR50, Appendix J, Type B testing requirements. The LLRT verifies the containment penetration components are sufficiently leak-tight to perform their safety function of providing containment integrity. Containment penetration components are allowed to have leakage within Appendix J limits. In terms of performing its safety function, it does not matter whether the containment penetration components are leaking an acceptable amount through the isolation valves (into non-classed piping outside containment) or through the penetration piping or valve pressure boundary directly to the environment outside containment. Either way, the Class 2 containment penetration components have satisfied their safety function and goal. Therefore, there is no safety basis to impose an augmented examination on such components to verify there is no through-wall leakage. The LLRT alone is sufficient to verify these Class 2 containment penetration components in non-classed systems will provide containment integrity.</p>	Delete 50.55a(b)(2)(xii)(B) from the proposed rulemaking.
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2		50.55a(b)(2)(xviii)(A)	Editorial comment: Reference to "American Society for Nondestructive Testing Control Certifications Program" should be "American Society for Nondestructive Testing Central Certification Program".	Delete "Control" and add "Central" as noted.
3		50.55a(b)(2)(xviii)(A)	Extension of the recertification interval from three years to five years for Level I and II NDE personnel is justified and supported by industry experience with the five year recertification interval for Level III personnel. Level III personnel have not demonstrated a need for more frequent recertification due to decreased proficiency after three years. The proficiency of NDE personnel increases as more and more experience is gained in performing examinations and evaluating indications and in participating in ongoing training programs. The programmatic controls imposed by SNT-TC-1A and CP-189 require that all NDE personnel be evaluated annually to verify they have gained sufficient examination experience and demonstrated their qualifications during the prior year in order to be allowed to continue their certification. Otherwise, NDE personnel are required to be recertified by examination.	Delete 50.55a(b)(2)(xviii)(A) from the proposed rulemaking.

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4		50.55a(b)(2)(xviii)(B)	<p>VT-2 visual examination personnel qualified under IWA-2316 of the 1998 Edition through 2000 Addenda of Section XI code are sufficiently qualified by training and experience to perform these examination to detect leakage. Requiring VT-2 examination personnel qualified under IWA-2316 to also pass an initial qualification examination and a requalification examination every 3 years is unnecessary and wasteful. Personnel meeting the requirements of IWA-2316 are fully qualified to perform VT-2 visual examinations without having to pass an examination. Imposing examination and periodic reexamination requirements appears to be based on a desire for consistency with the qualification requirements of other NDE methods. This is unnecessary and undesirable for the VT-2 examination technique.</p>	Delete 50.55a(b)(2)(xviii)(B) from the proposed rulemaking.
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5		50.55a(b)(2)(xviii)(C)	<p>VT-3 visual examination personnel qualified under IWA-2317 of the 1998 Edition through 2000 Addenda of Section XI code are sufficiently qualified by training and experience to perform these examinations. Requiring VT-3 examination personnel qualified under IWA-2317 to also pass an initial qualification examination and a requalification examination every 3 years is unnecessary and wasteful. Personnel meeting the requirements of IWA-2317 are fully qualified to perform VT-3 visual examinations without having to pass an examination. Imposing examination and periodic reexamination requirements appears to be based on a desire for consistency with the qualification requirements of other NDE methods. This is unnecessary and undesirable for the VT-3 examination technique.</p>	<p>Delete 50.55a(b)(2)(xviii)(C) from the proposed rulemaking.</p>
6		50.55a(b)(xix)	<p>Paragraph IWA-2240 in the 1998 Edition, 1999 Addenda, and 2000 Addenda has been revised to the extent it has lost its previous value as a mechanism to allow for alternative NDE requirements for Section XI, Division 1, based on demonstrated equivalency to the ANII. IWA-2240 in the 1998 Edition, 1999 Addenda, and 2000 Addenda is redundant to IWA-4520(c) and is of little value. We propose that 50.55a(b)(xix) be revised to impose IWA-2240 of the 1997 Addenda in lieu of IWA-2240 of the 1998 Edition, 1999 Addenda, and 2000 Addenda.</p>	<p>Revise 50.55a(b)(xix) to impose IWA-2240 of the 1997 Addenda in lieu of IWA-2240 of the 1998 Edition, 1999 Addenda, and 2000 Addenda.</p>

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7		50.55a(b)(2)(xxii)	<p>The basis for the revision of VII-4240 in the 1999 and 2000 Addendas was to require that annual training of UT examiners be focused either on hands-on practice to maintain their skills and to be able to detect and correctly evaluate data from representative flaws or to practice analyzing prerecorded data from representative flaws. In fact, the title was revised from "Annual Training" to "Annual Practice". Paragraph VII-4240 in the 1999 Addenda and 2000 Addenda requires the UT examiner to either examine material or welds containing flaws similar to those that may be encountered during inservice examinations or else analyze prerecorded data from material or welds containing flaws similar to those that may be encountered during inservice examinations. If the NRC's desire is to utilize the annual training/practice to "provide for training using manual techniques", the requirements of VII-4240 in the 1999 Addenda and 2000 Addenda come much closer to this goal than the requirements of VII-4240 in the 1998 Edition. VII-4240 in the 1998 Edition is so broadly written that hands-on UT practice is not required.</p>	Delete 50.55a(b)(2)(xxii) from the proposed rulemaking.
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8		50.55a(g)(6)(ii)(C)(2)	<p>This stipulation that licensees must meet the requirements of Appendix VIII of Section XI, including the Supplements of Appendix VIII, as published in the latest edition and addenda of Section XI cited in 50.55a(b)(2) is an onerous requirement. Administratively, it requires that each Owner upgrade his Ten Year ISI Plan and/or other program commitment(s) to the regulatory and enforcement authorities to cite the appropriate edition and addenda of Section XI applicable to his Appendix VIII program each time the 50.55a(b)(2) is upgraded to a later edition or addenda. Technically, it requires the Owner to reevaluate and very likely revise his Appendix VIII program based on the latest revisions of Appendix VIII in the latest NRC-approved code edition and addenda. Although incremental improvements in Appendix VIII requirements are to be expected in subsequent editions and addenda, these small gains in improved examination capability are not cost beneficial when weighed against the cost of frequent program updates. The overriding portion of the benefit to be gained from the expedited implementation of Appendix VIII requirements has already been accrued through the existing 50.55a(g)(6)(ii)(C) regulation. Mandatory updating of Appendix VIII programs should be deleted from paragraph 50.55a(g)(6)(ii)(C)(2). It is recommended that paragraph 50.55a(g)(6)(ii)(C)(2) be revised as follows:</p> <p>(2) When the inservice inspection program is required to be upgraded to an edition and addenda later than the 1995 Edition with the 1996 Addenda of Section XI, the requirements of Appendix VIII and the</p>	<p>Revise 50.55a(g)(6)(ii)(C)(2) as follows: When the inservice inspection program is required to be upgraded to an edition and addenda later than the 1995 Edition with the 1996 Addenda of Section XI, the requirements of Appendix VIII and the supplements to Appendix VIII to Section XI, Division 1, of the edition and addenda incorporated by reference in 10CFR50.55a(b)(2) shall be applied.</p>

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