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DOCKET NUMBER
PROPOSED RULE **PR 50**
(66FR 40626)

OCT 17 2001

LRN-01-0349



PSEG
Nuclear LLC

DOCKETED
USNRC

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

January 7, 2002 (1:46PM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Gentlemen:

**COMMENTS ON PROPOSED RULE,
REVISION OF 10 CFR 50.55a, "CODES AND STANDARDS"
(Federal Register Vol. 66, No. 150, pp. 40626-40640, dated August 3, 2001.)**

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for public input to the referenced Federal Register Notice.

The U.S. Nuclear Regulatory Commission (NRC) proposes to amend its regulations to incorporate by reference a later edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV Code) and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) to provide updated rules for construction, Inservice Inspection (ISI), and Inservice Testing (IST) of components in light-water cooled nuclear power plants. The proposed rule identifies the latest edition and addenda of the ASME BPV and OM Codes that have been approved for use by the NRC subject to certain limitations and modifications. The NRC is also withdrawing a supplemental proposed rule that would have eliminated the requirement for licensees to update their ISI and IST programs every 120 months to the latest ASME Code edition and addenda incorporated by reference in the regulations.

PSEG Nuclear LLC appreciates the opportunity to comment on the proposed rule and is pleased to submit attached comments.

Sincerely,

G. Salamon

Manager – Nuclear Safety and Licensing

Attachment: 10CFR50.55a, "Codes and Standards" Proposed Rule Comments

Template = SECY-067

SECY-02 168 REV. 7/99

OCT 17 2001

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ATTACHMENTComments on 10CFR50.55a Supplemental Proposed RuleComments Provided by: PSEG NUCLEAR LLC Organization: NUCLEAR RELIABILITY PROGRAMS

Comment #	FR Page #	FR Para. #	Comment	Recommended Action
1.	40627	2.2 Section XI	(b)(2)(xv)(C)(1) – PSEG proposes eliminating the use of Supplement 4, Subparagraph 3.2(c), which imposes three statistical parameters for depth sizing. The first parameter, 3.2(c)(1), pertains to the slope of a linear regression line. The linear regression line is the difference between measured versus true value plotted along a through-wall thickness. For Supplement 4 performance demonstrations, a linear regression line of the data is not applicable because the performance demonstrations are performed on test specimens with flaws located in the inner 15 percent through-wall. The differences between measured versus true value produce a tight grouping of results that resemble a shotgun pattern. The slope of a regression line from such data is extremely sensitive to small variations, thus making the parameter of Subparagraph 3.2(c)(1) a poor and inappropriate acceptance criterion	See next page

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Comment #	FR Page #	FR Para. #	Comment	Recommended Action
1. Continued	40627	2.2 Section XI	<p>The second parameter, 3.2(c)(2), pertains to the mean deviation of flaw depth. The value used in the Code is too lax with respect to evaluating flaw depths within the inner 15 percent of wall thickness. Therefore, PSEG proposes to use the more appropriate criterion of 0.15 inch RMS of 10 CFR 50.55a(b)(2)(xv)(C)(1), which modifies Subparagraph 3.2(a), as the acceptance criterion. The third parameter, 3.2(c)(3), pertains to a correlation coefficient. The value of the correlation coefficient in Subparagraph 3.2(c)(3) is inappropriate for this application since it is based on the linear regression from Subparagraph 3.2(c)(1). PSEG does not use paragraph 3.2(c) for sizing qualification, which would require a submittal for relief. Eliminating this requirement would aid both the utilities and the regulators from having to either submit, review, or process large numbers of basically generic requests for relief.</p>	<p>Reword to Require the use of 10 CFR 50.55a(b)(2)(xv)(C)(1) in lieu of 3.2(C)</p>

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2	40630	2.2.6 Substitution of Alternative Methods	<p>The proposed limitation to prohibit the use of IWA-2240 (1998 Edition, 1999 and 2000 Addenda's) IWA-4520(c) (1997 Addenda, 1998 Edition, 1999 and 2000 Addenda's) would extend an outage schedule under the following scenarios:</p> <p>Eliminating the option to substitute UT when required to perform radiography for repairs / replacements would add outage hours to the schedule due to the loss of productivity while radiography was in progress. Additionally if a weld repair were required and the applicable Construction Code requires radiography and adequate drainage of system is not possible Owner would incur outage schedule delays.</p>	<p>Add the following requirement: for those instances where substitution of alternative NDE method is as allowed by IWA-2240 and IWA-4520 (C) the requirements of the applicable Construction Code for the alternate NDE method is applicable.</p>

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3	40631	2.2.9 Supplemental Annual Training Requirements for Ultrasonic Examiners	(b)(2)(xxii) – The following change identified under the recommended action is proposed to the annual training requirements for Ultrasonic examiners. 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 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 flaws.	See page 5

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3 continued	40631	2.2.9 Supplemental Annual Training Requirements for Ultrasonic Examiners	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 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. The redundant requirements can be consolidated by substituting the 8 hours of annual	<i>Reword to read:</i> <i>(xxii) Annual Training Requirements for Ultrasonic Examiners. Supplemental annual training for ultrasonic examiner qualification must be in accordance with VII-4240, 1999 Addenda. Personnel shall practice ultrasonic techniques by examining welds containing cracks or analyzing prerecorded data of examinations performed on material containing cracks. Computer based training systems that use pre-recorded data may be used by personnel training for manual or automatic examinations. The cracks must be similar to those that may be encountered during inservice 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).</i>

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4	40632	2.3.1 Examination Coverage for Dissimilar Metal Pipe Welds	(b)(2)(xv)(A)(1) and (A)(2) – PSEG has no issue with the reasoning behind the proposed examination coverage change but there was confusion over the wording used and the changes identified under recommended action is intended as possible clarification. The most representative application and the one PSEG intends to qualify, is single-sided with access limited to the safe end side of the weld. However, when a meaningful examination can be conducted from the opposite (e.g., nozzle) side we intend to do so, and take coverage credit if needed, using the examination techniques qualified from the safe end side. The reasoning for this approach is two fold. First, the composition of the base material is of minor consequence when compared to the effects of the austenitic weld material. Second, the qualification is being conducted from the side of the weld that is most often accessible in the plant.	<i>Reword to read:</i> <i>(1) When implementing Supplement 2 and Supplement 10, examinations must be conducted in two axial and two circumferential directions. Where examination from both sides of the weld is not possible, full coverage credit from a single side may be claimed only after completing a successful single-sided Appendix VIII demonstration using flaws on the opposite side of the weld.</i> <i>(2) When implementing Supplement 3, examinations must be conducted in two axial directions. When examination in the circumferential direction is required, the circumferential examination must be conducted in two directions, provided access is available. Where examination from both sides is not possible, full coverage credit may be claimed from a single side.</i>

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5.	40632	2.3.4 Implementation of Appendix VIII to Section XI	<p>(g)(6)(ii)(c)(1) – The PSEG has no issue with the proposed schedule and is fully committed to meeting the required implementation dates. However, a clarification that the implementation date is November 22, 2002, for Supplement 2 and 3 for examinations conducted from the inside surface (primarily pressurized water reactor vessel nozzle-to-safe end and safe end-to-pipe welds) would aid both the utilities and the regulators from having to either submit, review, or process large numbers of basically generic requests for relief.</p> <p>Since these examinations are normally performed using the RPV examination device, it was the intention of PSEG to complete the piping qualifications that are performed from the inside surface, in conjunction with the nozzle to shell and dissimilar metal welds.</p>	<p>Add Clarification that the Implementation date is November 22, 2002, for Supplement 2 and 3 for examinations conducted from the inside surface (primarily pressurized water reactor vessel nozzle-to-safe end and safe end-to-pipe welds) would aid both the utilities and the regulators from having to either submit, review, or process large numbers of basically generic requests for relief.</p>