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Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
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Rules and Directives
Branch
USNRC

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66 FR 67335

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Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Comments on Draft Regulatory Guides
Reference: Federal Register Notice dated December 28, 2001;
Volume 66, Number 249, Pages 67335-67336
File: A-100, A-286

By the referenced Notice, the NRC requested comments on four draft regulatory guides. The draft guides pertain to licensees' use of ASME Code Cases. The Nuclear Management Company, LLC (NMC) has reviewed the draft guides. Comments on draft regulatory guide DG-1091, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," and draft regulatory guide DG-1112, "ASME Code Cases Not Approved for Use" are provided in the attachment.

NMC appreciates the opportunity to comment on these draft regulatory guides.

Sincerely,



Gary Van Middlesworth
DAEC Site Vice-President

Attachment

cc: G. Park
R. Anderson (NMC) (w/o)
M. Huting
B. Mozafari (NRC-NRR)
J. Dyer (NRC-Region III)
NRC Resident Office
DOCU
CTS

Template = ADM-013

F-RZDS = ADM-03

Call = A. Beranek (AFB)
W. Noeris (WEN)

COMMENTS ON DG-1112
ASME SECTION XI CODE CASES ONLY

| <u>CODE CASE</u> | <u>COMMENT</u> |
|-------------------------------|---|
| N-322 | NONE |
| N-323-1 | This limitation is based on the accessibility for performing volumetric examination. Considering Figure 1 in the code case, a volumetric examination MAY NOT be able to obtain 100% of the weld volume identified. |
| N-465 N-465-1 | NONE |
| N-473 N-473-1 | NONE |
| N-480 | CC N-597 does not supersede CC N-480 in its entirety. N-480 includes evaluation for selection of components to be examined as well as the analytical evaluation processes. This code case should be approved, possibly with the limitation on the use of CC N-597 as applicable in performing evaluations. |
| N-498-2 N-498-3 N-498-4 | These Code Cases should be approved with a limitation that the components being tested have been filled with water and at static pressure for a period of time, such as 92 days. |
| N-542 | This Code Case was incorporated into the Code in the 1995 Addenda and should be approved. |
| N-547 | The premise behind the elimination of the VT-1 examination was that the maintenance personnel that remove and install this bolting perform a visual examination. Part of the examination would be a visual of the threads and the actual installation. If there were galled or damaged threads the connection would not go together. This code case should be approved based on the maintenance and good bolting practices that a utility uses. |
| N-560 N-560-1 N-560-2 | This Code Case was developed as a pilot study for Class 1 piping and the application of Risk. It has not been updated like the other two code cases (N-577 and N-578). |
| N-561 N-561-1 | The ASME Code has criteria for determining the rate or extent of degradation by virtue of the fact that there is a minimum wall that is to be maintained per design. The Reinspection requirements are contained in 6.0(d) of the case. This code case should be approved. |
| N-562 N-562-1 | See comment on N-561, N-561-1 above. |
| N-568 | This code case is only applying an alternative to the examination and not the selection of the components. The only example would be riser clamps on piping that has four lugs welded to the pipe to support the clamp. The side of the lug that the clamp is resting on would not be accessible. To require the examination on this one side by removing the clamp would not compensate for the amount of exposure that would be needed. |
| N-574 | NONE |
| N-575 | Agreed...this was only for a plant specific need and should not be used generically. |

| | |
|------------------|---|
| N-577 N-577-1 | The code case does address the inspection strategy for augmented programs. The inspection table includes examination categories that reference those augmented programs. The code case is not to supersede any utility commitments to the regulator for those augmented examinations. The industry and the NRC are working on providing guidance for implementing a "Living Program for Risk-Informed ISI". These criteria should be referenced and this code case should be approved. |
| N-578 N-578-1 | See comments for N-577, N-577-1 above. |
| N-583 | NONE |
| N-586 | The issue that the NRC raises on the implementation of this code case is true, but not any different than what any edition or addenda of the code requires. If an examination reveals a flaw in a weld that exceeds the acceptance criteria using code words, it is possible to have a weld missed on the additional scope just based on the random sampling. By using this code case, the welds that are included in the additional scope would be selected by concentrating on the degradation mechanism. |
| N-587 | It appears this is not any different than performing an alternative examination in accordance with IWA-2240. The purpose of this code case would be to allow the use of Ultrasonic examinations in lieu of Radiography. Both are volumetric examinations, however both have limitations in what they can do. This code case should be approved because requiring an RT on a system at an operating plant requires draining the system, resulting in increased exposure. |
| N-589 | NONE |
| N-590 | NONE |
| N-591 | NONE |
| N-619 | NONE |
| N-622 | NONE |
| N-648 | There is an action item within the Code Committee to change this reference to an existing code table (Table IWB-3510-3). This has passed the Main Committee. It would be beneficial to accept this code case with the limitation to use Table IWB-3510-3. |

COMMENTS ON DG-1091
ASME SECTION XI CODE CASES ONLY

| <u>CODE CASE</u> | <u>COMMENT</u> |
|------------------|---|
| N-416-2 | Note 2 states that a 4 hour hold time must be maintained prior to the VT-2 visual examination. This is not consistent with the established regulatory position for non-insulated components, which has required only a 10 minute hold time. |
| N-532 | <p>This code case does not apply to editions of Section XI past the 1992 Edition. The proposed rule of August 3, 2001 for 10 CFR 50.55a endorses the 1998 Edition of Section XI with Addenda through 2000. Under IWA-2441, it states a code case must be applicable to the edition and addenda specified in the inspection plan. N-532 would not be allowed under 98A00. Code Case N-532-1 has been published, and it incorporates the edition of Section XI being endorsed in the proposed rule. Suggest N-532-1 be approved for use, as this revision of the code case encompasses all Section XI Editions through the 2000 Addenda.</p> <p>The NRC has conditionally approved this code case for use, provided the OAR-1 is submitted within 90 days after an outage. Suggest the forms be filed at the site in accordance with applicable IWA-6000 rules.</p> |
| N-617 | There is a typographical error in the table. It should state, "...for Table IWC-2500-1, Examination Category...." |
| N-654 | This Code Case should be added to the approved Code Case listing. If this Code Case is not approved for use, then anyone performing weld overlay examinations will be required to submit a relief request to satisfy the requirements of ASME Section XI, Appendix VIII, Supplement 11. The EPRI PDI program did not fully satisfy Supplement 11 as it was written. The intent of Code Case N-654 is to provide an alternative way to satisfy Supplement 11 using the PDI program as it was implemented. |