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April 5, 2004 (1:32PM)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: Comments on Proposed Rule 10 CFR 50.55a (RIN 3150-AH24)
Regarding ASME OM Code Section IST, Rules for Inservice Testing of LWR
Power Plants

Dear Secretary,

The Regulatory Endorsement Task Group of the Board on Nuclear Codes and Standards (BNCS) of the American Society of Mechanical Engineers (ASME) has reviewed the proposed rule published in the Federal Register, Vol. 69, No. 4, January 7, 2004 – 10 CFR Part 50.55a, RIN 3150-AH24, and have the following comments on Section IST.

- 10 CFR 50.55a (b) (3) (i) – Quality Assurance: the O&M Committee plans to update their endorsement of the ASME NQA-1 Standard or reference the Owner's Quality Assurance Program.
- 10 CFR 50.55a (b) (3) (ii) – Motor-Operated Valve Testing: the O&M Committee recognizes that the NRC has issued both Generic Letter 89-10 and 96-05; if ISTC-3500 is to address both design basis testing and period exercising, then the requirements of the OMN-1 Code Case (or equivalent) need to be imported into the OM Code as mandatory requirements; this effort is already on-going within the O&M Committee.
- 10 CFR 50.55a (b) (3) (iii) – Code Case OMN-1: the ASME appreciates that the NRC has created a dedicated Regulatory Guide 1.192 for the endorsement of OMN Code Cases.
- 10 CFR 50.55a (b) (3) (iv) – Appendix II: the ASME appreciates the removal of this modification for the 2003 Addenda of the OM Code.
- 10 CFR 50.55a (b) (3) (v) – Subsection ISTD: the BNC&S is tasking Subcommittee XI to remove its snubber testing requirements in IWF-5000; the O&M Committee will consider the additional requirement of performing these snubber examinations using the VT-3 visual method described in IWA-2213 (of Section XI).

April 5, 2004

Page 2

- 10 CFR 50.55a (b) (3) (vi) -- Exercise Interval For Manual Valves: the ISTC-3540 requirement is for "full-stroke exercising every five years, except for where adverse conditions may require the valve to be tested more frequently to ensure operational readiness." The O&M Committee is receptive to NRC data that leads to the necessity of more frequent testing (every two years in the rulemaking proposal), otherwise this modification should be deleted.

We appreciate the opportunity to comment on the NRC proposed rulemaking and look forward to future discussions to fully resolve these proposed modifications.

Sincerely,



C. Wesley Rowley, PE
Vice President
Nuclear Codes & Standards

Copy To:

R. I. Parry, Chairman, ASME O&M Committee
R. E. Gimple, Chairman, ASME B&PV Subcommittee XI