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**Comment on Draft Regulatory Guide DG-1125, Table 2
(Proposed Revision 14 of Regulatory Guide 1.147)**

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(5)

As a Principal Mechanical Engineer working for the past 18 years in the area of flow-accelerated corrosion (FAC) monitoring and mitigation at an operating nuclear power facility, I find the conditions imposed for the use of ASME Section XI Code Case N-597-1 in DG-1125 limiting to the point that the Case is of no use whatsoever. This is a surprising position, in that N-597-1 and its later revision 2 was developed as a voluntary consensus standard over the past 10 years, with NRC staff members voting on the Code Committees involved in the development, vetting and approval of the Case. To my knowledge, no negative votes were cast against the Case at any level Committee by a NRC member, in fact, the Case was well supported by NRC. A key element of the support the Case received stems from the fact that its rules are in full compliance with Construction Code requirements, design margins and concepts.

Prior to the issue of RG 1.147 Revision 13, licensees applied for and received relief for unencumbered use of the Case with but a single condition: the licensee FAC program must be based on strict alignment with the program requirements and conditions outlined in the "Recommendations for an Effective Flow-Accelerated Corrosion Monitoring Program," EPRI Document NSAC-202L. As NSAC-202L is the acknowledged industry standard for domestic -- and many (with a notable exception) international -- utilities' FAC programs, this requirement was entirely appropriate and willingly fulfilled. Thus, licensees were empowered to apply the Case as needed without further approval.

With the June 2003 issue of RG 1.147 Rev. 13, all that changed. By my reading of the conditions imposed in Revision 13 and continued in the proposed Revision 14, NRC relief must be requested for each application of the Case, a process that could require more time than simply repairing or replacing the pipe, which itself may involve an extension of outage duration. Per internal NRC memorandum (RBennis to JWClifford, "Summary of July 22, 2003 Internal Meeting...", August 6, 2003) each relief request must be supported by detailed calculations and discussions of FAC program bases, criteria, etc. Clearly, this is an onerous requirement for both licensee and regulator, and an abrupt change from the previous NRC posture.

I urge you to reconsider the conditions placed on licensee use of Code Case N-597.

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