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DRAFT REGULATORY GUIDE DG-1126 (Proposed Revision 1 to Regulatory Guide 1.193) ASME CODE CASES NOT APPROVED FOR USE

CODE CASE NUMBER	TABLE 2, UNACCEPTABLE SECTION XI CODE CASES SUMMARY	DATE OR SUPPLEMENT/ EDITION
N-561 N-561-1	Alternative Requirements for Wall Thickness Restoration of Class 2 and High Energy Class 3 Carbon Steel Piping, Section XI, Division 1	12/31/96 R3/28/01
	Neither the ASME Code nor the Code case have criteria for determining the rate or extent of degradation of the repair or the surrounding base metal. Reinspection requirements are not provided to verify structural integrity since the root cause may not be mitigated.	
N-562 N-562-1	Alternative Requirements for Wall Thickness Restoration of Class 3 Moderate Energy Carbon Steel Piping, Section XI, Division 1	12/31/96 R3/28/01
	Neither the ASME Code nor the Code case have criteria for determining the rate or extent of degradation of the repair or the surrounding basemetal. Reinspection requirements are not provided to verify structural integrity since the root cause may not be mitigated.	

The reasons for NRC disapproval do not appear pertinent to published Code Cases N-561-1 and N-562-1, both of which contain the following specific requirements:

3.1(d) The predicted maximum degradation of the overlaid piping and the overlay over the design life of the restoration shall be considered in the design. The predicted degradation of the piping shall be based on in-situ inspection and established data for similar base metals. If the weld overlay is predicted to become exposed to the corroding medium, the predicted degradation of the overlay shall be based upon established data for base metals or weld metals with similar chemical composition to that of the filler metal used for the weld overlay.

6.0 (d) Follow-up inspection shall be scheduled as necessary to confirm any design assumptions relative to rate or extent of future degradation.

Considering that the reasons for disapproval in Regulatory Guide 1.193 appear to be resolved by the latest published Code cases, it is requested that Code Cases N-561-1 and N-562-1 be included in Revision 14 to Regulatory Guide 1.147.

Thank you,

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