

July 8, 2005

Dr. Graham B. Wallis, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: ASTM LETTER ON STAFF PARTICIPATION IN STANDARDS DEVELOPMENT

Dear Dr. Wallis:

By memorandum dated June 3, 2005, you forwarded a May 16, 2005, letter from Roger Stoller, Chairman of the American Society for Testing and Materials (ASTM) Committee E10 on Nuclear Technology and Applications. In his letter, Dr. Stoller expressed concern over reduced NRC participation in Subcommittee E10.02. The NRC has maintained a high level of attendance at these meetings, and will continue to participate in future meetings. As an example of recent participation, the NRC has been represented by at least two staff members and contractors in every meeting of the subcommittee over the last 3 years.

Dr. Stoller's main concern is the ASTM Subcommittee E10.02 effort to revise standard E900, "Standard Guide for Predicting Radiation-Induced Transition Temperature Shift in Reactor Vessel Materials." For at least 5 years, the NRC staff and its contractors and the industry have worked closely to ensure the completeness and accuracy of a database of the results of surveillance tests from commercial nuclear power plants in accordance with Appendix H to 10 CFR Part 50. The surveillance test data provide indications of the response of reactor pressure vessel (RPV) steels to neutron irradiation during plant operation. Much of this interaction has been coordinated with ASTM Subcommittee E10.02. As a result, the NRC and the industry now have a high-quality database for developing models to predict the response of RPV steels to neutron irradiation.

The NRC will use the database to update modeling which will be used to revise Regulatory Guide 1.99. This updated modeling will then be used to provide final benchmarking of the technical basis reevaluation for the pressurized thermal shock (PTS) rule (10 CFR 50.61), maintaining consistency between the models used in the PTS rule and the regulatory guide. It became apparent to NRC staff that the consensus process would not produce an acceptable model on the schedule needed to support the effort to revise the PTS rule. Therefore, it was

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necessary for the NRC to continue to move forward with the modeling effort, with the intent to return to the subcommittee to provide a briefing of the results.

We will send a reply letter to Dr. Stoller that includes information contained in this letter.

Sincerely,

/RA Martin J. Virgilio Acting For/
Luis A. Reyes
Executive Director
for Operations

cc: Chairman Diaz
Commissioner Merrifield
Commissioner Jaczko
Commissioner Lyons
SECY
OGC

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