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From:
Brian Sheron

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To:
FAST

***** YELLOW *****

For Signature of:

Routing:
Dyer
Borchardt
NRR Mailroom

Description:
Codification of MRP-139 Guidance (Primary System Piping Butt-Weld Inspection and Evaluation Guideline)

Assigned To:
DCI

Contact:
BATEMAN, WILLIAM H

Special Instructions:



NUCLEAR ENERGY INSTITUTE

Alexander Marion
SENIOR DIRECTOR, ENGINEERING
NUCLEAR GENERATION DIVISION

February 10, 2006

Mr. James E. Dyer
Director, Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Codification of MRP-139 Guidance (Primary System Piping
Butt-Weld Inspection and Evaluation Guideline)

PROJECT NUMBER: 689

Dear Mr. Dyer:

On December 20, 2005, you sent a letter to the American Society of Mechanical Engineers (ASME) requesting that ASME develop a plan for codification of inspection and evaluation guidelines including flaw evaluation methodologies, inspections, inspection schedules, and mitigation techniques. ASME responded to the NRC's request in two letters; February 6, 2006 and February 9, 2006. Per their response, ASME intends to hold a meeting on February 13th at which the NRC and industry's EPRI Materials Reliability Program (MRP) will present their views on codifying this guidance. These presentations will allow ASME to judge the need for and extent of potential new Code requirements for dissimilar metal butt-welds in PWRs. NEI supports the process being pursued by ASME and offers the following thoughts on this issue for your consideration.

First and most importantly, MRP-139 guidance is based on managing degradation as a means of ensuring the integrity of the primary system. The ASME Code is based on pressure integrity, a more basic standard with greater safety significance. It would not be appropriate to include MRP-139's guidance in the ASME Code as this would fundamentally change the basis of the affected Code sections in a way that is not consistent with other Code requirements.

Second, the inspection frequency guidance in MRP-139 is newly developed and not validated by field experience and inspection results; therefore, the guidance will likely change. The fact that this information is relatively new has two effects on the decision to codify the guidance. First, the ASME Code does not normally adopt new guidance until it has been field demonstrated. Second, EPRI guidelines can be changed much more readily than can the Code to reflect new information.

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For both of these reasons, use of the ASME Code to capture this guidance in its current state may actually inhibit the transition of new insights into inspection guidance because of the time required for the Code revision process. Moreover, should NRC incorporate the resulting Code requirements into 50.55a then additional burdensome processes will be necessary to deal with future changes.

Finally, some of the stress improvement technologies addressed in MRP-139 are proprietary. The ASME Code does not endorse proprietary technologies.

In addition to the above, we continue to believe that the NRC's use of the ASME Code process, or other means as a way of imposing a "Regulatory Footprint" on industry guidelines implemented under our Materials Initiative, is unnecessary and may act as a disincentive to future voluntary industry actions.

We appreciate your consideration of these matters. If you have any questions regarding this information, please contact me at 202-739-8080; am@nei.org or Jim Riley at 202-739-8137; jhr@nei.org.

Sincerely,



Alexander Marion

c: Dr. Brian W. Sheron, U. S. Nuclear Regulatory Commission
Mr. John A. Grobe, U. S. Nuclear Regulatory Commission
Mr. William H. Bateman, U. S. Nuclear Regulatory Commission
Mr Ted J. Sullivan, U. S. Nuclear Regulatory Commission
Mr. Terence L. Chan, U. S. Nuclear Regulatory Commission