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CODES & STANDARDS

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June 10, 2006

Mr. John A. Grobe, Director  
Division of Component Integrity  
Office Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, Md. 20852

Subject: ASME Actions to Address Alloy 82/182/600 Materials and to Define Role of ASME Code in Ensuring Integrity of Pressure Retaining Components

- References:
1. ASME Letter from Mr. Kenneth R. Balkey, Vice President, Nuclear Codes and Standards to Mr. James E. Dyer, Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission dated February 17, 2006.
  2. NRC letter from Mr. John A. Grobe, Director, Division of Component Integrity, Office of Nuclear Reactor Regulation to Mr. Kenneth R. Balkey, Vice President, ASME Nuclear Codes and Standards dated March 13, 2006.
  3. Nuclear Energy Institute letter from Mr. Jack W. Roe, Director, Operations Support, Nuclear Generation Division to Ms. Catherine Haney, Director, Division of Operating Reactor Licensing, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission dated May 4, 2006.

Dear Mr. Grobe:

Per Reference 1, it was indicated that we would provide updates to cognizant U.S. Nuclear Regulatory Commission and industry management as significant activities have been accomplished related to actions for addressing ASME Boiler and Pressure Vessel (B&PV) Code inspection requirements for managing primary water stress corrosion cracking (PWSCC) in butt weld connections in reactor coolant pressure boundary piping. Key activities did occur during the ASME Boiler Code meetings in Phoenix in May 2006 regarding the development of a draft Code Case for defining inspection frequencies for the subject dissimilar metal weld connections. In addition, the Executive Committee of ASME Boiler & Pressure Vessel Code Subcommittee XI also took action to address the topic that you raised in your letter (Reference 2) regarding the role of the ASME Code in ensuring the integrity of pressure retaining components. This letter provides an update on both of these developments.

During the May 15th meeting of the ASME Section XI Task Group on Alloy 600, NRC representatives presented a draft Code Case for examination requirements for PWR primary system piping butt welds subject to PWSCC. NRC staff representatives offered to prepare a draft of this Code Case at the February 2006 Task Group meeting to initiate the development of these examination requirements. The efforts of the NRC staff members to prepare and present this draft Code Case are appreciated by our ASME Nuclear Codes and Standards members.

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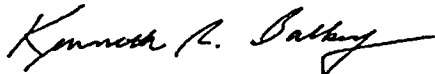
Given the complexity of several elements involved in this standards action, many comments and questions on the proposed examination requirements were raised by both Task Group members and from other interested parties who attended the meeting. Because of this level of discussion and the need to have a well documented and understood technical basis, the Task Group Chair recommended and obtained a small team of volunteers to address these comments and questions to bring forward a revision of the draft Code Case for consideration at their next meeting in August 2006. A small task team of utility, vendor, and NRC representatives has been formed and has already begun working together to keep this key action moving forward. In order to facilitate development of the next draft of the Code Case, a conference call for the task team members was held on June 7, 2006 to identify the future actions needed to bring forward the revised Case. In short, a draft Code Case with proposed examination requirements for the subject weld connections has been developed, and a team is in place to address comments, to seek supporting technical information, and to bring recommendations forward to move the action through the consensus process.

The Executive Committee of the ASME B&PVC Subcommittee XI met on May 16 and reviewed developments related to NRC interest in discussing the role of the ASME Code in ensuring the integrity of pressure retaining components, including the aspect of ensuring leakage integrity. The Committee was also aware of a recent letter from the Nuclear Energy Institute to the NRC (Reference 3) that included an NEI White Paper titled, "*Treatment of Operational Leakage from ASME Class 2 and 3 Components*," dated May 2006. This document discusses, in part, NEI's position on the relationship of ASME B&PVC Section XI inservice inspection requirements to NRC guidance on operability determinations regarding pressure boundary leakage in ASME Code Class 1, 2 and 3 components.

Given the NRC stated interest in the role of the ASME Code in ensuring pressure boundary integrity, along with ASME's interest in reviewing the recent NEI White Paper, the Executive Committee decided that it would be prudent to develop an ASME position paper on this topic. To this end, cognizant ASME Subcommittee XI representatives volunteered to form a Project Team that will report to the Subcommittee XI Executive Committee.

As key progress is made on the above developments, updates will be provided to you and cognizant industry management. As always, if you have any questions, please do not hesitate to contact either me or Kevin Ennis in our New York office, at your convenience.

Sincerely,

A handwritten signature in cursive script, reading "Kenneth R. Balkey".

Kenneth R. Balkey, PE  
Vice President,  
Nuclear Codes and Standards

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cc: Mr. James E. Dyer, U.S. Nuclear Regulatory Commission  
Dr. Brian W. Sheron, U.S. Nuclear Regulatory Commission  
Mr. William Bateman, U.S. Nuclear Regulatory Commission  
Mr. Ted Sullivan, U.S. Nuclear Regulatory Commission  
Mr. Terence Chan, U.S. Nuclear Regulatory Commission  
Mr. Kevin Ennis, ASME Staff, Director, Nuclear Codes & Standards  
Mr. Richard Porco, Vice Chair, ASME Board on Nuclear Codes & Standards Operations  
Mr. Bryan Erler, Vice Chair, ASME Board on Nuclear Codes & Standards Strategic Initiatives  
Mr. Gary Park, Chair, ASME Subcommittee on Nuclear Inservice Inspection  
Mr. Richard Swayne, Vice Chair, ASME Subcommittee on Nuclear Inservice Inspection  
Mr. Robin Dyle, Chair, Task Group Alloy 600  
Mr. Guido Karcher, Chair, ASME Boiler & Pressure Vessel Standards Committee  
Mr. Mike Robinson, Chair, MRP Issue Integration Group (IIG)  
Mr. Jeff Gasser, Executive Chair of PWR Materials Management Program (PMMP)  
Mr. Dave Modeen, Chief Nuclear Officer, Electric Power Research Institute  
Mr. Alex Marion, Executive Director of Nuclear Operations, Nuclear Energy Institute