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PR 50
71FR62942

Use of Code Case N-460 with N-659

The following comment relates to the proposed condition for Code Case N-460 contained on page 62949 of the Federal Register, Vol. 71, No. 208, dated October 27, 2006. Particularly, the last sentence which states - *"Thus, the NRC proposes to condition the use of Code Case N-460 in the final guide such that the Code Case can only be applied when performing inservice examinations in accordance with a Section XI inservice inspection program."*

While I agree that Code Case N-460 should not be used in conjunction with Code Case N-659, the conditional acceptance proposed above is considered unnecessary. Code Case N-659 and N-659-1 already require that the ultrasonic examination area be accessible and "include 100% of the volume of the entire weld, plus 1/2 in. (13mm) of each side of the welds". Similar provisions are contained in Code Case N-713.

Though the actual wording of the proposed condition is not specified, the limitation to "inservice" examinations noted above will be burdensome during repair and replacement of existing components because of the preservice examination requirements contained in IWA-4530. The inservice only conditional acceptance would prohibit the use of Code Case N-460 for preservice examination of repairs to existing components and in-kind replacements. Neither of which would typically affect access. Though the extent is unknown, the end result would be additional, otherwise unneeded, relief requests.

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SECY-02

From: Carol Gallagher
To: Evangeline Ngbea
Date: 12/05/2006 11:31:48 AM
Subject: Comment letter on Incorporation by Reference of ASME B&PV Code Cases

Attached for docketing is a comment letter on the above noted proposed rule that I received via the rulemaking website on 12/4/06.

Carol

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