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RULES AND REGULATIONS

Secretary, U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudicating Staff

**SUSQUEHANNA STEAM ELECTRIC STATION
INCORPORATION BY REFERENCE OF
AMERICAN SOCIETY OF MECHANICAL
ENGINEERS BOILER AND PRESSURE
VESSEL CODE CASES CONTAINED IN
DRAFT REG. GUIDES DG-1133 AND DG-1134
(RIN 3150 AH80)
PLA-6149**

**Docket Nos. 50-387
and 50-388**

The following are PPL Susquehanna, LLC's (PPL) comments on Draft Regulatory Guides DG-1133 "Proposed Rev 34 to Regulatory Guide RG 1.84, 'Design, Fabrication and Materials Code Case Acceptability, ASME Section III' " and DG-1134 "Proposed Rev 15 to RG 1.84, 'Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1.' "

DG-1133

Code Case N-659

This comment deals specifically with the proposed rewriting of paragraphs (b) and (d) of Code Case N-659.

The NRC Staff has concerns with the "non blind" ASME Section V approach currently allowed by Code Case N-659. The NRC's desired methodology would be an Appendix VIII type of qualification. However, re-writing a performance based methodology as stated in the proposed changes could introduce new problems or challenges that would not surface until the actual qualification was attempted. Some examples of potential problems are:

- The proposed changes do not specifically address grading unit lengths as Appendix VIII does.
- Introducing a 2% deep flaw in thin materials may be a challenge.
- Thickness/diameter ranges are not addressed

SUNSE Review Complete

Template = ADM-013

*K-RIDS = ADM-03
Add = W. Morris (WEN)*

While agreeing with the use of a Section XI performance demonstration methodology, PPL would prefer to use the existing Performance Demonstration Initiative (PDI) process that is already administered by the EPRI NDE Center and performing a supplemental blind qualification to a previously approved procedure by adding a minimum of three different construction-type flaws. The NDE Center has protocol in place for administering procedure/personnel qualifications and EPRI's implementation procedures have been accepted by the NRC staff to be in compliance with Appendix VIII and 10 CFR 50.55a. The detection criteria for the additional three flaws should be three (100%). Using the existing EPRI PDI program would remove the uncertainties associated with the proposed criteria.

DG-1134

Code Case N-460

This comment deals with 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 PPL agrees 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 Cases 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.

Code Case N-504-2

- 1) Applicability of this code case is only up to the 1995 Edition. After 1995, the reference paragraphs in the Code have changed and administratively the Code Case cannot be used. Code Case N-504-3 has corrected these issues. Code Case N-504-3 should be approved for use in Rev. 15 of Reg. Guide 1.147 instead of N-504-2.
- 2) The limitation on this Code Case is unchanged from Revision 14 of Regulatory Guide 1.147. However, the limitation requires the use of Non-Mandatory Appendix Q and points the user to the 'cstools' website. Appendix Q is now published and is available in the 2004 Edition with the 2005 Addenda, and later editions and addenda, of Section XI. The limitation should point users to the 2005 Addenda of Section XI, not the 'cstools' website.

Alternatively, we recommend the NRC expedite the review and approval of Code Case N-504-3 (published in supplement 5 of the 2004 edition) with no limitations. During the evaluation of Code Cases for Revision 14 of the Reg. Guide, the NRC identified four concerns with Code Case N-504-2 that were addressed by the ASME in Code Case N-504-3 and Non-Mandatory Appendix Q. Thus, Code Case N-504-3 addresses the concerns the NRC has with Code Case N-504-2.

Code Case N-517-1

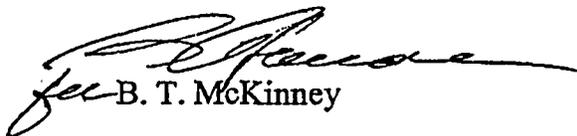
The limitation on this Code Case is unchanged from Revision 14 of Regulatory Guide 1.147. The limitation should be removed and this Code Case added to the list of acceptable Section XI Code Cases. This limitation was to be addressed by Subcommittee XI action BC04-265. During discussions at the ASME Subcommittee XI meetings in November of 2005, as well as a number of prior telephone conferences, the NRC representatives and the rest of the committee agreed this limitation was no longer needed. The original NRC concerns were with substandard and fraudulent material. The NRC representatives to the committee expressed this issue is no longer a concern. Therefore, this action, BC04-265, was revised to simply incorporate Code Case N-517-1 into the Code. That action has now passed the standards committee with the support of the NRC.

Code Case N-532-3

NRC has placed a condition on this Code Case, which requires the Outage Activity Report to be submitted within 90 days after each refuel outage. Code Case N-532-4 contains the requirement to submit the OAR within 90 days after each refuel outage. Code Case N-532-4 should be used in draft Rev. 15 of RG 1.147 instead of Code Case N-532-3 in order to resolve the 90 day submittal after each refuel outage conditional acceptance issue.

Please contact Mr. Richard Tombasco at (610) 774-7220 if you have any questions concerning this letter.

Sincerely,



B. T. McKinney

cc: NRC Region I
Mr. R. Guzman, NRC Project Manager
Mr. R. Janati, DEP/BRP
Mr. C. Welch, NRC Sr. Resident Inspector

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