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Nuclear Management Company, LLC

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

June 19, 2007

L-HU-07-018

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

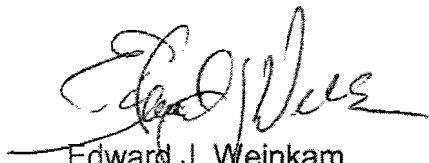
Comments on Proposed Rule 10 CFR Part 50.55a, "Industry Codes and Standards;  
Amended Requirements," RIN 3150-AH76 (Federal Register Vol. 72, No. 65,  
April 5, 2007)

Nuclear Management Company, LLC (NMC) appreciates the opportunity to comment on the proposed changes to 10 CFR 50.55a, Codes and Standards published in the Federal Register on April 5, 2007. NMC is the licensed operator of the Monticello Nuclear Generating Plant, the Point Beach Nuclear Plant Units 1 and 2, and the Prairie Island Nuclear Generating Plant Units 1 and 2.

NMC has reviewed proposed comments from Performance Demonstration Initiative (PDI) Program, Materials Reliability Program (MRP) Inspection, and American Society of Mechanical Engineers (ASME) Section XI Committee. NMC agrees with the comments provided by these industry groups with the exception of item 3 from the ASME Section XI Committee. This item is for a change to Paragraph 50.55a(b)(2)(xv), which specifies implementation of Appendix VIII of Section XI, the 1995 Edition through the 2001 Edition of the ASME BPV Code with regard to ultrasonic examinations of piping systems. The proposed change would reference and allow the use of the 2004 Edition of the ASME Code. The ASME Section XI Committee agrees with this change while PDI takes exception to this item. NMC agrees with PDI and also takes exception to this item based on the fact that the proposed change to Paragraph 50.55a(b)(2)(xv) is contrary to the existing requirement in (xxiv). The existing requirement of (xxiv) is "Incorporation of the Performance Demonstration Initiative and Addition of Ultrasonic Examination Criteria. The use of Appendix VIII and the supplements to Appendix VIII and Article I-3000 of Section XI of the ASME BPV Code, 2002 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(2) of this section, is prohibited." There are no proposed changes for (xxiv), therefore, the proposed rule will contain conflicting requirements.

Additionally, PDI identified that there were no proposed changes to the existing requirements in (xv) subparagraphs. Conflicts will exist in the examination or qualification requirements (e.g., Supplement 4 single sided access qualifications) since

only portions of the (xv) subparagraph requirements have been incorporated into the 2004 Edition of Appendix I and Appendix VIII in modified form. NMC agrees with the PDI recommendation that (xv) remain unchanged until the 2007 Edition of Appendix I and VIII are adopted on an expedited basis.



Edward J. Weinkam  
Director, Nuclear Licensing and Regulatory Services  
Nuclear Management Company, LLC

cc: Michael D. Wadley - Site Vice President, Prairie Island Nuclear Generating Plant  
Timothy J. O'Connor - Site Vice President, Monticello Nuclear Generating Plant  
Dennis L. Koehl - Site Vice President, Point Beach Nuclear Plant

**From:** "Gunderson, Lynne" <Lynne.Gunderson@nmcco.com>  
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**Date:** Tue, Jun 19, 2007 4:48 PM  
**Subject:** RIN 3150-AH76 - Comments on Proposed Rule 10CFR50.55a

Nuclear Management Company, LLC (NMC) appreciates the opportunity to comment on the proposed changes to 10 CFR 50.55a, Codes and Standards published in the Federal Register on April 5, 2007 (RIN 3150-AH76). Our comment letter is attached.

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**Subject:** RIN 3150-AH76 - Comments on Proposed Rule 10CFR50.55a  
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**From:** "Gunderson, Lynne" <[Lynne.Gunderson@nmcco.com](mailto:Lynne.Gunderson@nmcco.com)>  
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