

May 14, 2008

Kenneth R. Balkey, PE  
Nuclear Codes and Standards, Vice President  
American Society of Mechanical Engineers  
Three Park Avenue  
New York, NY 10016-5990

Dear Mr. Balkey:

On behalf of the U.S. Nuclear Regulatory Commission (NRC or the staff), I am responding to your letter of February 20, 2008, regarding the American Society of Mechanical Engineers' (ASME) request for the NRC to consider providing license renewal interim staff guidance regarding use of the ASME Boiler and Pressure Vessel (B&PV) Code. Your letter submitted ASME's proposals to clarify use of the ASME B&PV Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," as it is referenced in NUREG-1801, Volumes 1 and 2, "Generic Aging Lessons Learned (GALL) Report," Revision 1. More specifically, the ASME proposals concern three issues:

1. License renewal applicant use of earlier ASME B&PV Code editions and addenda than those referenced in the GALL Report,
2. Time limits regarding NRC-approved ASME B&PV Code relief requests when a licensee's inspection interval extends into the period of extended operation, and
3. Use of NRC-approved ASME B&PV Code cases when a licensee's inspection interval extends into the period of extended operation.

The staff has reviewed the proposed clarifications and supporting documentation sent with your letter. In addition, on April 14, 2008, the staff held a public teleconference with you and other ASME representatives to gain additional information to better understand the proposals. Enclosed is a meeting summary documenting the discussions during this teleconference. This summary is also accessible under Accession No. ML081340300 in the NRC's Agencywide Documents Access and Management System (ADAMS) on the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

As documented in the enclosed meeting summary, the staff and ASME are generally in agreement that minor clarifications could enhance the license renewal guidance documents. Regarding the first issue, such clarification could make it clearer that when an applicant relies on an earlier version of the ASME B&PV Code for its aging management programs, an exception to the GALL Report is not necessary provided the applicant references an appropriate *Federal Register* publication which states that the GALL Report conclusions are valid for the particular ASME B&PV Code version. The staff also identified that it would need to determine whether NRC-approved ASME B&PV Code cases and relief requests are valid to the end of the inspection interval, even if this interval extends into the period of extended operation. The staff also agreed with ASME that industry-supplied examples could be helpful to fully understand ASME's proposals.

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Therefore, I suggest that we schedule another teleconference or public meeting to further discuss these topics after the industry provides the examples.

The NRC appreciates your comments to improve the effectiveness and efficiency of the license renewal process. If you have any additional questions on this matter, please contact Mr. Matthew Homiack of my staff by telephone at 301-415-1683 or by e-mail at [matthew.homiack@nrc.gov](mailto:matthew.homiack@nrc.gov).

I trust that NRC has established a path forward which is responsive to addressing the proposals in your letter.

Sincerely,

**IRA**

Samson Lee, Acting Director  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Enclosures:  
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K. Balkey

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Letter to K. Balkey from M. Homiack, dated May 14, 2008

SUBJECT: Y020080045 – DLR Response to ASME's Proposed License Renewal ISGS

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