

May 13, 2008

ORGANIZATION: American Society of Mechanical Engineers

SUBJECT: SUMMARY OF THE TELECONFERENCE BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS

The U.S. Nuclear Regulatory Commission (NRC) staff and the American Society of Mechanical Engineers (ASME) held a public teleconference on April 14, 2008, to discuss ASME's proposed interim staff guidance (ISG) on use of the ASME Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," as it applies to Title 10, Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," of the *Code of Federal Regulations* (10 CFR Part 54), and as specifically referenced in NUREG-1801, Revision 1, "Generic Aging Lessons Learned (GALL) Report." ASME, on behalf of the nuclear power industry, proposed these ISGs by letter dated February 20, 2008, which is accessible under Accession No. ML080600423 in the NRC's Agencywide Documents Access and Management System on the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

ASME requested that the NRC consider publishing ISG on three specific topics:

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.

For reference, Enclosure 1 lists the participants and Enclosure 2 contains the meeting agenda. As outlined in Enclosure 2, the meeting discussions focused on the three ISG topics above. Following discussion on these specific topics, there was a general discussion on future actions for all three topics. Summaries on all these discussions follow.

#### Proposed ISG Topic 1

ASME stated that 17 GALL Report aging management programs (AMPs) reference use of Section XI, 2001 Edition with the 2002 and 2003 Addenda, of the ASME B&PV Code, and that the majority of these programs have a footnote which states that, "An applicant may rely on a different version of the ASME [B&PV] Code, but should justify such use." ASME stated that because of the recommended justification, this guidance is a potential burden to applicants who rely on earlier versions of Section XI of the ASME B&PV Code for their AMPs.

The NRC staff stated that, as mentioned in these footnotes, final rulemakings for amending Section 50.55a, "Codes and Standards," of 10 CFR address whether the GALL Report's conclusions are also applicable for AMPs that rely on ASME B&PV Code editions and addenda which are incorporated by reference into 10 CFR 50.55a. As stated in Volume 65, Page 53047,

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of the *Federal Register* (65 FR 53047), the NRC recognized in the publication of the initial license renewal guidance documents that the requirements of 10 CFR 50.55a would result in future changes to those AMPs that rely on the ASME B&PV Code. Therefore, the NRC staff evaluates these later editions for their adequacy for license renewal as part of the 10 CFR 50.55a rulemakings. The NRC staff stated that there is existing guidance and when an applicant relies on a different version of the ASME B&PV Code, 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 remain valid. ASME requested that NRC staff clarify this position in an ISG.

### Proposed ISG Topic 2

ASME stated that, per Section XI of the ASME B&PV Code, some license renewal applicants could be in a situation where their inservice inspection interval extends into the period of extended operation. Regarding relief requests for this period, ASME pointed to specific language in Volume 2, Chapter 1, "Application of the ASME Code," of the GALL Report, which states in part that these applicants should re-apply for relief through the 10 CFR 50.55a process once they receive renewed licenses. ASME stated that this guidance creates an unnecessary burden for applicants who may encounter this situation. The NRC staff indicated that it would verify whether a relief request could be valid for its previously approved inspection interval if the licensee receives a renewed license. The NRC staff and ASME agreed that the language in the GALL Report could be misleading and NRC agreed to take action to clarify this guidance, if appropriate. ASME agreed that clarification, if necessary, could be helpful for applicants and stated that it expected licensees with renewed licenses to follow the 10 CFR 50.55a requirements for relief requests during the period of extended operation. ASME requested that NRC document this issue as an ISG if the NRC determines that approved relief requests are valid to the end of the inspection interval, even if this interval extends into the period of extended operation.

### Proposed ISG Topic 3

ASME stated that the GALL Report does not address code cases in a general sense; however, as an example, the program described in GALL Report Section XI.M11A gives recommendations on use of code cases. ASME indicated that, as in the case for relief requests, additional guidance would reduce applicant burden by clarifying that NRC-approved code cases can be used until the end of the current inservice inspection interval, even if this interval extends into the period of extended operation. On this point, ASME also raised an observation that claiming consistency with the GALL Report is difficult for applicants because the ASME B&PV Code can be modified through relief requests and code cases. ASME requested that NRC document this issue as an ISG if the NRC determines that NRC-approved code cases are valid to the end of the inspection interval, even if this interval extends into the period of extended operation.

### General Discussion

The NRC staff and ASME agreed on a common goal for applicants to fully utilize the GALL Report by claiming as few exceptions as possible. To this effect, the NRC agreed that the issues raised by ASME could help in achieving this goal, so there was a discussion on potential

follow-up activities for making any necessary clarifications. ASME stated that it would like to see ISGs issued as soon as possible to clarify these issues for applicants currently in the license renewal process. On this issue, the NRC staff stated that the ISG process can be lengthy, including publication for public comment. The NRC staff further stated that it is currently preparing for the next update to the GALL Report. The NRC staff and ASME agreed that there should be future discussions as to whether the final clarifications could be ISGs or addressed in the next revision to the GALL Report. To better understand ASME's proposals, the NRC staff indicated that mark-ups to the GALL Report would be considered in developing ISGs or for updating the license renewal guidance documents. ASME also suggested that the industry could provide some examples to better illustrate why clarifications on these issues would be appropriate.

NRC provided this meeting summary to ASME for comment.

**\RA\**

Matthew Homiack, General Engineer  
Program Operations Branch  
Division of License Renewal  
Office of Nuclear Reactor Regulation

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Letter to the American Society of Mechanical Engineers from M. Homiack, dated May XX, 2008

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**Teleconference Meeting  
Between the U.S. Nuclear Regulatory Commission Staff and  
The American Society of Mechanical Engineers  
Participant List**

April 14, 2008

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Terence Chan	NRC
Matthew Mitchell	NRC
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Matthew Homiack	NRC
Amy Hull	NRC
Keith Hoffman	NRC
Yeon-Ki Chung	NRC
James Medoff	NRC
David Wrona	NRC
Goutam Bagchi	NRC
Dennis Davis*	American Society of Mechanical Engineers (ASME)
Ryan Crane*	ASME
Gary Park*	ASME
Kenneth Balkey*	ASME
Bryan Erler*	ASME
Rick Swayne*	ASME
Ted Meyer*	ASME
Kevin Ennis*	ASME
Steven Dort*	FirstEnergy License Renewal
Cliff Custer*	FirstEnergy License Renewal
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Doug Ramey*	Energy Northwest
Loyd Wright*	Southern California Edison
Nancy Chapman*	Bechtel
Chris Mallner*	Progress Energy
Gary Stevens*	Structural Integrity
Fred Polaski*	Exelon Nuclear
Chalmer Meyer*	Southern Nuclear

\* Participated by teleconference



U.S. NUCLEAR REGULATORY COMMISSION MEETING  
REGARDING PROPOSED INTERIM STAFF GUIDANCE ON USE OF THE AMERICAN  
SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE  
FOR REACTOR LICENSE RENEWAL

U.S. Nuclear Regulatory Commission Headquarters  
Rockville, MD

TELECONFERENCE AGENDA  
April 14, 2008

(Times are approximate)

- 9:00 AM Introductions
- 9:05 AM Opening Remarks
- Matthew Homiack, on behalf of the NRC
  - Kenneth Balkey, on behalf of ASME
- 9:20 AM Proposed ISG Topic No. 1 – License renewal applicant use of earlier ASME Code Section XI editions and addenda than those referenced in the GALL Report
- ASME Presentation
  - Discussion
- 9:40 AM Proposed ISG Topic No. 2 – Time limits regarding NRC-approved ASME Section XI relief requests when a licensee's Section XI inspection interval extends beyond the period of extended operation
- ASME Presentation
  - Discussion
- 10:10 AM Proposed ISG Topic No. 3 – Use of NRC-approved ASME Section XI code cases when a licensee's Section XI inspection interval extends beyond the period of extended operation
- ASME Presentation
  - Discussion
- 10:35 AM Public Participation
- 10:50 AM Conclusion and Discussion on Future Actions
- 11:00 AM Adjourn