June 27, 2008

Mr. Bryan A. Erler, Vice President
Nuclear Codes and Standards
American Society of Mechanical Engineers
Three Park Avenue
New York, NY 10016-5990

Dear Mr. Erler,

By letter to Mr. Kenneth Balkey dated March 13, 2006, the NRC staff inquired into the role of the American Society of Mechanical Engineers (ASME) Code in ensuring the integrity of pressure retaining components. The NRC staff indicated that this topic is of great interest, including the aspect of ensuring leakage integrity. In a letter dated June 10, 2006, Mr. Balkey indicated that ASME was forming a project team to develop a position paper on this topic. Mr. Balkey also indicated in this letter that as key progress is made, updates would be provided to the NRC staff and cognizant industry management.

Mr. Balkey sent the NRC staff a letter dated March 22, 2008, that summarized the work of the project team formed by the ASME Section XI Executive Committee to address the topic of our March 13, 2006, letter on leakage integrity. Mr. Balkey indicated that the Section XI Executive Committee is satisfied that the Code provides appropriate requirements for performing periodic testing of pressure boundary components for leakage and for repair or replacement of defective components. His letter also indicated that the review identified an area where Section XI Code inspection and test requirements currently do not specify corrective action for pressure boundary leakage identified outside of a required pressure test (e.g., during plant operation). The Executive Committee of Section XI concluded that Section XI should require evaluation or other corrective action for any identified leakage in the pressure boundary. As a result, a standards action has been initiated within ASME Section XI to accomplish this objective.

The NRC staff supports this conclusion as we believe that this topic is an essential aspect of ensuring integrity that is not clearly specified by the ASME Code and is currently being addressed by plant owners with guidance from the NRC. In the interest of maintaining safety, we believe that the ASME should develop requirements that apply to leakage identified beyond the confines of inservice inspections. Operational experience has shown that the discovery of unexpected degradation of ASME Code components occurs frequently outside of scheduled inservice inspections. In addition, we believe it is important for ASME to address this issue given the international stature of the ASME Code.

The staff is interested in understanding the scope of the standards action that has been initiated. For example, it is not clear to us whether the standards action will address issues such as structural integrity evaluation methods, non-destructive examination criteria to characterize the degradation as it affects structural integrity, as well as the qualification requirements of the related examinations. Please provide us with a copy of the position paper that led to the conclusion reached by the Executive Committee of Section XI or other feedback to understand the intended scope of this action.

We would like to convey our appreciation to ASME for agreeing to address this important area and would appreciate being provided with regular updates on ASME's progress of this issue as well as any related activities that may be undertaken.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

cc: A. Marion, Senior Director of Engineering, Nuclear Energy Institute
G. Park, Chairman, ASME Subcommittee on Nuclear Inservice Inspection
K. Ennis, Director, Nuclear Codes and Standards
R. L. Dyle, Southern Company
D. Weakland, Chair, MRP Issue Integration Group
D. Modeen, Chief Nuclear Officer, Electric Power Research Institute
K. Balkey, Consulting Engineer, Westinghouse Electric Company
R. West, Technical Consultant, Dominion Resources Services, Inc.

We would like to convey our appreciation to ASME for beginning to address this important area and would appreciate being provided with regular updates on ASME's progress of this issue as well as any related activities that may be undertaken.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

cc: A. Marion, Senior Director of Engineering, Nuclear Energy Institute
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