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September 26, 2008

**Brian E. Holian, Deputy Director**  
**Division of License Renewal**  
**Office of Nuclear Reactor Regulation**  
**One White Flint North**  
**11555 Rockville Pike, M/S 0-11F1**  
**Rockville, MD 20852**

**Subject:** Proposed Interim Staff Guidance on the Use of ASME Section XI Code Editions/Addenda, Relief Requests and Code Cases for License Renewal in Accordance with 10 CFR 54 and NUREG-1801

**References:**

1. NRC Letter dated May 14, 2008 from Samson Lee (Acting Director, Division of License Renewal) to Kenneth R. Balkey, ASME Vice President Nuclear Codes and Standards.
2. ASME Letter dated February 20, 2008 from Kenneth R. Balkey (ASME Vice President Nuclear Codes and Standards) to Bruce Boger, Associate Director for Operating Reactor Oversight and Licensing.

Dear Mr. Holian:

Reference 2 was submitted to the NRC for consideration of issuing Interim Staff Guidance (ISG) on the use of ASME Section XI Code Editions/Addenda, Relief Requests and Code Cases for license renewal in accordance with 10 CFR 54 and NUREG-1801. This letter resulted in a conference call that was held on April 14, 2008 where three main topics were discussed.

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

This meeting/conference call was well received and had at times 30 participants whether it was at the meeting or per teleconference. The above three items were introduced by ASME and discussed.

Reference 1 was in response to reference 2 and provided a summary of the results of the meeting/teleconference call. Reference 2 indicated “the staff and ASME are generally in agreement that minor clarifications could enhance the license renewal guidance documents”. One of the items discussed was whether the use of NRC approved ASME BPV Code Cases and Relief Requests are still valid to the end of the inspection interval, even if this interval extends into the period of extended operations. The staff requested that ASME provide some industry examples that would help the staff to fully understand the ASME proposal.

ASME has performed a survey of a few selected nuclear plants and has the following information to supply to assist the NRC staff in evaluating the ISG that the ASME is recommending.

The following plants have indicated that the current Inservice Inspection Interval would end past the current operating license and would extend into the period of extended operation:

Plant	Interval End Date	Extended Period of Operation start date
Point Beach Unit 1	06/2012	10/2010
Point Beach Unit 2	06/2012	03/2013
Cooper	03/2016	01/2014
Kewaunee (IWE)	09/2016	06/2014
Monticello	05/2012	09/2010
Oconee Unit 1	07/2013	02/2013
Oconee Unit 2	09/2014	10/2013
Oconee Unit 3	12/2014	07/2014
McGuire Unit 1	12/2021	06/2021
McGuire Unit 2	03/2024	03/2023
Catawba Unit 1	06/2025	12/2024
Catawba Unit 2	09/2026	02/2026
Three Mile Island Unit 1	04/2021	04/2014
St. Lucie Unit 1	02/2018	03/2016
Dresden Unit 2	01/2013	12/2009
Dresden Unit 3	01/2013	01/2011
Oyster Creek	10/2012	04/2009
Turkey Point Unit 3	02/2014	07/2012
Turkey Point Unit 4	04/2014	04/2013

The above list indicates that there are several utilities that have need of the guidance on how to address currently approved Inservice Inspection Programs as the extended period of operation is entered. To that end ASME requests that another conference call be set up so that this issue can be discussed and come to resolution to assist both the industry and

the NRC staff. The suggested topics for the conference call would be 1) confirmation of the NRC position on ASME concern number 1, 2) clarification of the NRC position on ASME concern number 2, 3) discussion regarding the NRC position on ASME concern number 3, and 4) NRC and ASME perspectives on developing an ISG vs. addressing the ASME concerns in a revision to the GALL report.

We look forward to your favorable response to this request and working toward a resolution of this issue. Please contact me or Mr. Kevin Ennis, ASME Director, Nuclear Codes and Standards at (212) 591-7075 or [ennisk@asme.org](mailto:ennisk@asme.org).

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Bryan A. Erler". The signature is fluid and cursive, with the first name "Bryan" being more prominent.

Bryan A. Erler, PE  
Vice President  
Nuclear Codes and Standards

Cc: Jennifer Uhle  
Board on Nuclear Codes and Standards  
Section XI Executive Committee