



T. Moser, Chairman
STARS Integrated Regulatory Affairs Group
P.O. Box 620, Fulton, Missouri 65251

STARS-09007

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Rulemaking and Directives Branch
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RULES AND DIRECTIVES
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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
Comments on Draft Regulatory Guide DG-1211, "Materials
and Inspections for Reactor Vessel Closure Studs"**

- References:
- 1) 74 FR 17547, Issuance and Availability of Draft Regulatory Guide, dated April 15, 2009. NRC-2009-0166
 - 2) Draft Regulatory Guide DG-1211 (Proposed Revision 1 of Regulatory Guide 1.65, dated October 1973), "Materials and Inspections for Reactor Vessel Closure Studs," April, 2009, ML082820439

Dear Mr. Norris,

The Strategic Teaming and Resource Sharing (STARS)¹ alliance submits the following comments in response to the Federal Register notice (Reference 1) soliciting comments on the Commission's development of draft Regulatory Guide DG-1211 (Reference 2).

1. Section C, Sub-section 2, Paragraph 2, last sentence states "Low melting point materials, such as zinc, tin, cadmium, etc., should not be used with plated fasteners." The remainder of paragraph 2 discusses the use of lubricants. However, based on the wording of the last sentence, it is not clear whether the sentence was intended to relate to lubricants or to plated fasteners. Please clarify the wording of the last sentence in paragraph 2 so that it is clear that fasteners should not be plated with zinc, tin, or cadmium.

¹ STARS consists of thirteen plants at seven stations operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, Arizona Public Service Company, and Southern California Edison.

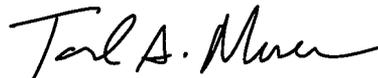
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Cedd = M. Baysie (mmb)
W. Norris (wen)

2. The fourth paragraph in section B. Discussion, changes the limitation of 170 ksi measured ultimate tensile strength as stated in the original RG, based on a position established in NUREG-1801. However, the fifth sentence in this paragraph incorrectly states the position of NUREG-1801 and is technically not correct. It is believed the NRC's intent for this sentence would be "Therefore, design conservatism should be exercised in determining the sizing of the studs so that the strength level of the material selected will not result in a measured yield strength exceeding 1034 MPa (150 ksi)." This then agrees with the first supplemental requirement in Regulatory Position C.1.
3. The discussion regarding inservice examinations of Section XI, as presented in the first three paragraphs on page 4 of DG-1211 incorrectly states the current Section XI requirements. For example, the last sentence in the first paragraph says the provisions of Section XI should be supplemented, but then includes incorrect statements of the Section XI requirements in the following two paragraphs. Therefore, the last sentence in the first paragraph on page 4 ("To ensure detection...should be supplemented, as discussed below") should be deleted. The second paragraph (beginning with "The inspection program...") should be deleted because Section XI does not use visual examinations for RV studs. Similarly, the third paragraph (beginning with "Volumetric examinations...") should be deleted because conventional UT techniques have been eliminated from Section XI for RV studs. In the place of this deleted information, the NRC should consider adding discussion that Section XI provisions now adequately examine RV studs and no supplemental provisions are needed. This matches the proposed changes in section C. Regulatory Position, which has deleted all supplemental provisions on inspection contained in the original RG. The NRC may wish to discuss the use of Section XI Appendix VIII Supplement 8 and the provisions of Section XI Code Cases N-307-3 and N-652, which are approved in RG 1.147, and which are contained in Section XI requirements in the 2000 Addenda and 2002 Addenda, respectively. These Section XI requirements provide adequate examination of RV studs and provide a basis for removing inspection from the Regulatory Position.
4. As a minor comment, at the end of the third paragraph on page 4 of DG-1211, it states "Revision 3 of the code case was approved March 28, 2001 (Supplement 1 of the 2007 Edition..." The "2007 Edition" should be replaced with "2001 Edition".
5. The second bullet in C.1 on Bolting Materials should be deleted. This simply states what Section III already requires. Therefore, it does not supplement the requirements of Section III and does not need to be included.
6. The first bullet in C.2, Protection Against Corrosion, should be deleted. This simply states what Section III NB-2122 already requires. Therefore, it does not need to be included.

Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact me at 573-676-4775, or tmoser@ameren.com, or Ken Petersen at 620-340-9406, or kepeter@wcnoc.com.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Moser". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group