

NRCREP Resource

From: Patrick O'Regan [poregan@epri.com]
Sent: Monday, August 10, 2009 5:50 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by
Patrick O'Regan (poregan@epri.com) on Monday, August 10, 2009 at 17:49:35

Document_Title: DG-1193 ASME Code Cases Not Approved for Use (ML090900461) 06/2009

Comments: As identified in the FRN there were several lesson learned from USNRC approved pilot plant application as well as a number of follow-on applications. Four units to date have been approved which include both BWR and PWRs. These lessons learned consisted of the items listed below which can easily be incorporated into Reg. Guide 1.147 thereby allowing plants to use this code case in the short term. Acceptance of N716 into Reg. Guide 1.147, with the comments below, will not only result in a substantial reduction in worker exposure and radwaste, but will also reduced unnecessary NRC staff burden, as compared to waiting until the code case is revised by ASME and subjected to review by NRC during subsequent revision of Reg. Guide 1.147, which at times can take multiple numbers of years to be issued.

Technical Changes

Section 2.0 General Requirements and in particular Section 2(a)(5) should include the following requirement "any piping segment whose contribution to large early release frequency is greater than 1E-07 be classified as high safety significant".

Section 4.0 Inservice Inspection Requirements and in particular Section 4(c), the following sentence should be added: If this can not be accomplished due to a limited number of available welds between the first isolation valve and the RPV, then 25% of the available piping welds between the RPV and the first isolation valve shall be selected, not to exceed ten percent of the RCPB.

Table 1, Footnote 10 should be revised to read as follows: To be conducted during a system pressure test or a pressure test specific to that element or segment, in accordance with Examination Categories B-P, C-H or D-B as applicable.

Technical Consideration

PRA Technical Adequacy – EPRI submitted, and NRC accepted for review EPRI report 1018427 which provides guidance on the use of plant-specific PRAs in developing RI-ISI programs, including N716 (ML0915503357). Lessons learned for application of N716 to a number of plants both before and after issuance of Reg. Guide 1.200 r1 were used in the development of this report. This could be referenced in Reg Guide 1.147 as a condition for using N716.

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*SUNSI Review Complete
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