6/02/09
74FR 26440
(10)

NRCREP Resource

From: Kevin Hall [nobody@www.nrc.gov]
Sent: Tuesday, August 11, 2009 7:14 AM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

RECEIVED
2009 AUG 11 PM 12:24
RULES AND DIRECTIVES
BRANCH
USNRC

Below is the result of your feedback form. It was submitted by

Kevin Hall (khall@ iddealsolutions.com) on Tuesday, August 11, 2009 at 07:13:43

Document_Title: DG-1193 ASME CODE CASES NOT APPROVD FOR USE (ML090900461)

Comments: Lesson learned from the pilot plant application as discussed in the FRN consisted of the items listed below which could easily be incorporated into Reg. Guide 1.147 thereby allowing plants to use this code case in the short term. This will result in a substantial reduction in worker exposure and radwaste 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.

Clarification:
The following sentence could be added to Reg Guide 1.147: The provisions of this Case may define additional requirements for Class 1 or 2 pressure retaining components exempt from NDE by Section XI, Class 3 or Non-Class pressure retaining components".

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 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. This could be referenced in Reg Guide 1.147 as a condition for using N716.

organization: Citizen

address1: 7655 W. Gulf to Lake Highway

address2: suite 14

E-RIDS = ADM-03
Add = M. Baptiste (mmb1)
W. Morris (wem)

SUNSI Review Complete
Template = ADM-013

city: Crystal River

state: FL

zip: 34429

country: USA

phone: 6015729678