

NRCREP Resource

6/00/09
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Sent: Wednesday, August 12, 2009 3:09 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

Scott Chesworth (schesworth@structint.com) on Wednesday, August 12, 2009 at 15:08:55

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

Comments: As identified in the FRN, there were several lessons-learned from the USNRC-approved pilot applications, as well as a number of follow-on applications. To date, four units have been approved, including both BWRs and PWRs. These lessons-learned consist 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 Code Case N-716 into Reg. Guide 1.147, along with the comments below, will not only result in a substantial reduction in worker exposure and radwaste, but will also reduce unnecessary NRC staff burden, as compared to waiting until the Code Case is revised by ASME and subjected to review by NRC during the subsequent revision of Reg. Guide 1.147, which often take several years to issue.

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."

To 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."

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SUNSI Review Complete

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