

August 14, 2009

Rulemaking and Directives Branch
Mail Stop: TWB-05-B01M
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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74 FR 26440

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Subject: Comments on Draft Regulatory Guide DG-1192

References: 1: Draft Regulatory Guide DG-1192; (Proposed Revision 16 of Regulatory Guide 1.147, dated October 2007); Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1, June 2009, Division 1, (ADAMS Accession No. ML090900445)

Dear Sir or Madam:

I am pleased to have the opportunity to provide comments and suggestions on the Nuclear Code Cases listed in Draft Regulatory Guide DG-1192, contained in Reference 1.

I work in the nuclear industry and I am a member of the American Society of Mechanical Engineering (ASME) Section XI Sub Group Non Destructive Examination (NDE) and also a member of the Performance Demonstration Initiative (PDI) Steering Committee. As such, I support the NRC's endorsement of ASME Nuclear Code Cases and the NRC's continued effort in this area to complete these updates and rulemakings on a regular basis. However, I request that the conditions placed on the Code Case identified below be reconsidered.

Section XI Code Cases in DG-1192, Reference 1; including the regulatory discussion contained in the Proposed Rule, Reference 2, - comments on the conditions placed on Code Cases N-583.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

ADAMS Accession No. ML090900445

Approval Date: August 14, 1997

See Numeric Index for expiration and any reaffirmation dates.

Case N-583
Annual Training Alternative
Section XI, Division 1

Inquiry: What alternative to the annual training requirements of Appendix VII-4240 may be used?

Reply: It is the opinion of the Committee that, as an alternative to the requirements of Appendix VII-4240, supplemental practice may be used to maintain UT personnel examination skills. Personnel shall practice UT techniques by examining or by analyzing pre-recorded data from material or welds containing flaws similar to those that may be encountered during inservice examinations. This practice shall be at least 8 hr per year and shall be administered by an NDE Instructor or Level III; no examination is required.

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add = M. Poyasie (mmb1)
W. Yarris (WEN)

The NRC has addressed the Code Case in revision 15 of Regulatory Guide 1.147, as indicated below:

Code Case Number	Table 2 Conditionally Acceptable Section XI Code Cases	ASME Approval Date
	Condition	
N-583	<i>Annual Training Alternative, Section XI, Division 1</i>	2/14/03
	(1) Supplemental practice shall be performed on material or welds that contain cracks, or by analyzing prerecorded data from material or welds that contain cracks. (2) The training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee's facility.	

The conditions stipulated in revision 15 of RG 1.147 and proposed DG 1192 pertaining to ASME approved Code Case N-583 are a direct result of discussions and resolutions of the Final Rule published in September of 1999. Initially, the NRC was proposing an increase from 10 hours of annual ultrasonic training specified in ASME XI, Appendix VII, to 40 hours annually. Through discussions with industry personnel during the rulemaking review process and also with Electric Power Research Institute (EPRI) and Appendix VIII PDI personnel, the NRC withdrew their 40 hour annual training proposed increase.

The NRC recognized ASME Code Case N-583 as being a suitable substitute for the Appendix VII annual training. However, it was expressed in discussions that *"studies have shown that his capability begins to diminish within approximately 6 months if skills are not reinforced by inspection of small specimens, and many inspectors do not routinely perform examinations."* The NRC mandated the 8 hours of training be performed no longer than 6 months prior to performing examinations at a nuclear facility and the specimens contain actual cracks.

Comments – At the time when the 10 CFR rules were established in 1999 and conditions for use of this Code Case N-583 were first presented, the industry was in the early stages of Appendix VIII implementation. The increased "hands on" training was not challenged at the time and considered an acceptable alternative to the initially proposed 40 hours of annual practice.

All agree that performing the practice on specimens with actually cracks is definitely beneficial, and ASME should adopt. However, there are many in the industry that feel that, after 10 years of implementation, the twice yearly requirement of the "hands on" practice has become significantly burdensome, specifically with logistics and cost of implementation, for owners and vendors. It was stated in the discussions that many individuals do not routinely perform examinations and for this instance, the 6 month training may be warranted. However, the greater burden lies with the vendor, who generally employs the PDI qualified individuals who actually utilize their qualification throughout the year. The "annual" practice on the actual "cracked" specimens, as required in the Code Case, is felt to be sufficient.

Therefore, I hereby request that consideration be given to remove the current requirement in the conditions of use for ASME approved Code Case N-583 of performing the practice "6 months prior" to performing exams, and leave "as-is" in the case to "annually". If not agreeable, I would like to at least recommend that a 6 month "proficiency", similar to the "annual proficiency" specified and implemented by ASNT CP-189, be considered, which would at least relieve some of the burden on the regular users.

If you have any questions, please contact me by telephone at (205)992-5802 or by e-mail drcordes@charter.net. and thank you for consideration of my comments.

Very Truly Yours,

Daniel R Cordes
ASME Section XI SG NDE and PDI Steering Committee Member

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