

**NRCREP Resource**

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**Sent:** Saturday, August 22, 2009 4:22 PM  
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**Subject:** Public Comments on DG-1911

**Attn: Rulemaking, Directives, and Editing Branch**

**Office of Administration**

**U.S. Nuclear Regulatory Commission**

**Washington, DC 20555-0001**

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RULES AND DIRECTIVES  
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**Subject:** Comments on Draft Regulatory Guides DG-1191, DG -1192, DG-1193, and the Proposed Rule Incorporating the Final Revisions of these Regulatory Guides into 10 CFR 50.55a

**References:** 1. Draft Regulatory Guide DG-1191, (Proposed Revision 35 of Regulatory Guide 1.84, dated October 2007), Design, Fabrication, and Materials Code Case Acceptability, ASME Section III, April 2009, Division 1, (ADAMS Accession No. ML080910389)

2. 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)

3. Draft Regulatory Guide DG-1193, (Proposed Revision 3 of Regulatory Guide 1.193), ASME Code Cases Not Approved For Use, April 2009, Division 1, (ADAMS Accession No. ML080920854)

4. Proposed Rule, *Federal Register*, Vol. 74, No. 104, pp. 26303-26310, Tuesday, June 2, 2009, 10 CFR Part 50, RIN 3150-A137, {NRC 2009-0014}, Incorporation by Reference of Regulatory Guide 1.84, Revision 35, and Regulatory Guide 1.147, Revision 16, Into 10 CFR 50.55a

Dear Sir or Madam:

Although I am an active volunteer for ASME Codes & Standards, my recent illness prevented me from submitting my comments to Mr. Ray West in time for inclusion in the formal ASME response. However, I am making this effort as a member of the public to attempt to correct a long standing error

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1 Add = M. Baystie (mmb1)  
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in Reg. Guide 1.84, specifically, Code Case N-71-18. I was Chair of the original task group that introduced the predecessor Code Case 1644.

During the review period from July 16, 2009 to July 31, 2009 of the Draft ASME letter a Section III Code Case N-71-18 was commented on and added to the letter along with many other comments. Mr. West has addressed all the comments received by him and the Draft letter was submitted to the NRC.

Actually, the NRC condition is wrongly applied to CodeCase N-71. Here is the condition:

**Section III Code Cases in DG-1191, Reference 1**, - ASME has several comments on the Staff's conditional acceptability of **Code Case N-71-18** that is currently listed in Revision 34 of Regulatory Guide 1.184 and is proposed to be incorporated in Revision 35 of Regulatory Guide 1.84 with this DG.

- **Code Case N-71-18**, *"Additional Materials for Sub section NF, Class 1, 2, 3, and MC Component Supports Fabricated by Welding, Section III, Division 1,"* December 8, 2000

#### NRC Conditions

- (1) The maximum measured ultimate tensile strength (UTS) of the component support material must not exceed 170 Ksi in view of the susceptibility of high-strength materials to brittleness and stress corrosion cracking.
- (2) Certain applications may exist where a UTS value of up to 190 Ksi could be considered acceptable for a material and, under this condition, the Design Specification must specify impact testing for the material. For these cases, it must be demonstrated by the applicant that: the impact test results for the material meet Code requirements,
  - (a) the impact test results for the material meet Code requirements,
  - (b) the material is not subject to stress corrosion cracking by virtue of the fact that:
    - (i) a corrosive environment is not present, and
    - (ii) the component that contains the material has essentially no residual stresses or assembly stresses, and
    - (iii) it does not experience frequent sustained loads in service.

Code Case N-71-9 was the last time that both welded and non welded supports were listed together in one case. That case was split into two cases, N-71-10, covering materials for component supports that could be fabricated by welding, and N-249, covering higher strength materials for which welded fabrication was not permitted. Whereas the condition was applicable to N-71-9 and earlier versions, it should not be applied to N-71-10 and later revisions, because the case for welded supports has no

materials listed with a minimum tensile strength above 125 ksi. The condition should only be used for CC N-249, and all later revisions, because this case includes materials with minimum tensile strengths above 135 ksi, up to 190 ksi.

.Thank you for your consideration of this late comment

Marcus N. Bressler, PE