

September 09, 2009

ORGANIZATION: American Society of Mechanical Engineers

SUBJECT: SUMMARY OF THE AUGUST 10, 2009, TELECONFERENCE BETWEEN
THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE
AMERICAN SOCIETY OF MECHANICAL ENGINEERS

The U.S. Nuclear Regulatory Commission staff (NRC or the staff) and representatives of the American Society of Mechanical Engineers (ASME) held a public teleconference on August 10, 2009, to further discuss ASME proposals concerning use of the ASME Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components" (the Code), for reactor license renewal under Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," of Title 10 of the *Code of Federal Regulations* (10 CFR Part 54), and as specifically referenced in NUREG-1801, Revision 1, "Generic Aging Lessons Learned (GALL) Report." This teleconference followed a prior teleconference held on April 14, 2008 (a summary was issued on May 13, 2008, and is available through the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML081340300). The teleconference also followed correspondence exchanged between the NRC and the ASME in letters dated February 20, 2008 (ML080600423), May 14, 2008 (ML081300854), September 26, 2008 (ML082910198), and January 15, 2009 (ML083330044). Electronic copies of documents in ADAMS can be accessed through the NRC's Public Electronic Reading Room on the Internet at <http://www.nrc.gov/reading-rm/adams.html>.

The list of meeting participants is provided in Enclosure 1 and the meeting agenda is provided in Enclosure 2. A summary of the meeting's discussions follows:

1. License renewal applicant use of earlier Code editions and addenda than those referenced in the GALL Report

Although the GALL Report references a certain Code edition and addenda, the NRC has also approved the use of other Code editions and addenda for license renewal. The NRC staff noted that it is not necessary for a license renewal applicant to claim an exception to the GALL Report when basing an aging management program on a Code edition or addenda different from that referenced in the GALL report, as long as the Code edition and addenda cited by the applicant has been approved by the NRC for license renewal. Approval would be provided by *Federal Register* notices for final rule makings which modify 10 CFR 50.55a and endorse specific Code editions and addenda. To resolve this issue, the NRC staff stated its plans to clarify the GALL report to identify that current NRC-approved Code editions and addenda – the 1995 edition through the 2004 edition – are acceptable for the GALL Report aging management programs that reference the Code. The NRC staff indicated that this clarification will be made in the upcoming Revision 2 of the GALL Report and not through the issuance of license renewal interim staff guidance (LR-ISG) as previously indicated.

The NRC staff asked the ASME representatives whether the scope of this clarification is adequate and specifically whether Code editions and addenda earlier than the 1995 edition should be included in the GALL Report. The ASME representatives generally agreed with the approach proposed by the NRC. Although unsure as to the number of license renewal applicants that may use Code editions earlier than 1995, the ASME representatives indicated that this number would likely be small. The ASME representatives also asked the NRC staff to explain the basis for choosing the 2004 Code edition as the latest edition that would be included in Revision 2 to the GALL Report. The NRC staff explained that this edition is the latest approved by the NRC for license renewal and endorsed in 10 CFR 50.55a. Further, the NRC staff stated, it is uncertain as to whether later Code editions or addenda would be approved by the NRC before Revision 2 to the GALL Report is published.

The ASME representatives stated that if a Code edition or addenda is endorsed by the NRC under 10 CFR 50.55a, then its use for license renewal should be acceptable without further justification for both renewed license holders and license renewal applicants. The NRC staff stated that when new Code editions and addenda are endorsed by 10 CFR 50.55a, a renewed license holder may update its affected aging management programs in accordance with 10 CFR 50.59. In justifying such changes, a licensee could reference the *Federal Register* notice for the 10 CFR 50.55a rulemaking, considering the statements regarding acceptability of the Code edition and addenda for license renewal use. Similarly, the NRC staff stated, a license renewal applicant should reference such a *Federal Register* notice in its onsite license renewal program bases documents. Making such a reference is an acceptable justification for not claiming an exception to the GALL Report in the license renewal application.

2. Time limits regarding NRC-approved Code relief requests when a licensee's inspection interval extends beyond the start of the period of extended operation

The NRC staff stated its technical position that the use of NRC-approved Code relief requests should be valid for the inspection interval for which they were approved, even if the interval ends in the period of extended operation. As such, after the renewed license is granted, the licensee should not re-apply for such relief. The ASME representatives agreed with this position.

The NRC staff stated that it plans to clarify Chapter I of the GALL Report to reflect this position. The NRC staff also stated that, as previously indicated, this guidance would be issued in an LR-ISG which would subsequently be incorporated into Revision 2 of the GALL Report. The ASME representatives asked the NRC staff for an estimated completion schedule for the LR-ISG. The NRC staff said that it is developing a schedule, but final issuance of the LR-ISG is expected before publication of Revision 2 to the GALL Report.

3. Use of NRC-approved Code cases when a licensee's inspection interval extends beyond the start of the period of extended operation

Consistent with its proposed position on Code reliefs, the NRC staff stated that the use of NRC-approved Code cases should also be valid for the inspection interval for which

they were approved, even if the interval ends in the period of extended operation. The ASME representatives also agreed with this position, stating that the same philosophy for Code reliefs should also apply to Code cases. The NRC staff stated that it plans to issue guidance on Code cases in the LR-ISG addressing Code reliefs.

4. The NRC staff emphasized that the discussion provided during the teleconference is subject to issuance of formal NRC staff positions in the documents described above, either Revision 2 of the GALL report or the LR-ISG.

NRC provided this meeting summary to ASME for comment.

/RA/

Matthew J. Homiack, General Engineer
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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Participant List

Meeting to Discuss Use of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for Reactor License Renewal

August 10, 2009

Name	Affiliation
Samson Lee	U.S. Nuclear Regulatory Commission (NRC)
Allen Hiser*	NRC
Travis Tate	NRC
Terence Chan*	NRC
Matthew Homiack	NRC
Robert Gramm	NRC
Keith Hoffman*	NRC
Barry Elliot	NRC
James Medoff	NRC
Amy Hull	NRC
Bart Fu*	NRC
Gene Carpenter*	NRC
Gary Park*	American Society of Mechanical Engineers (ASME) (NextEra Energy)
Dennis Davis*	ASME
Dan Burgess*	ASME (Inservice Engineering)
Ted Meyer*	ASME (Westinghouse)
Jin Ki Hong*	ASME (KINS)
Bill Server*	ASME (ATI Consulting)
Frank Gregor*	ASME (LCM Technology)
Garry Young*	ASME (Entergy Services)
Ken Thomas*	ASME (NPPD)
Rick Swayne*	ASME (Reedy Engineering)
Ryan Crane*	ASME
Bryan Erler*	ASME (Erler Engineering)
Andrew Iams*	ASME (Westinghouse)
Kazunobu Sakamoto*	ASME (Japan Nuclear Energy Safety Organization)
Seiji Asada*	ASME (Mitsubishi Heavy Industry)
Truong Vo*	ASME (Dominion)
Julie Keys*	Nuclear Energy Institute
Katy Makeig*	Advanced Technologies and Laboratories, Inc.

* Participated by teleconference

**U.S. NUCLEAR REGULATORY COMMISSION
MEETING TO DISCUSS USE OF THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS
(ASME) BOILER AND PRESSURE VESSEL CODE FOR REACTOR LICENSE RENEWAL**

**U.S. Nuclear Regulatory Commission Headquarters
Rockville, MD**

MEETING AGENDA

August 10, 2009

(Times are approximate)

- 2:00 PM Introductions
- 2:10 PM License renewal applicant use of earlier ASME Code Section XI editions and addenda than those referenced in the GALL Report
- NRC Presentation
 - Discussion
- 2:20 PM Time limits regarding NRC-approved ASME Section XI relief requests when a licensee's Section XI inspection interval extends beyond the start of the period of extended operation
- NRC Presentation
 - Discussion
- 2:35 PM Use of NRC-approved ASME Section XI code cases when a licensee's Section XI inspection interval extends beyond the start of the period of extended operation
- NRC Presentation
 - Discussion
- 2:45 PM Public Participation
- 2:55 PM Conclusion
- 3:00 PM Adjourn

ENCLOSURE 2

they were approved, even if the interval ends in the period of extended operation. The ASME representatives also agreed with this position, stating that the same philosophy for Code reliefs should also apply to Code cases. The NRC staff stated that it plans to issue guidance on Code cases in the LR-ISG addressing Code reliefs.

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Matthew J. Homiack, General Engineer
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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ADAMS Accession No.: **ML092440512 (Letter), ML092090397 (Meeting Notice), ML092440521 (Package)**

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Letter to ASME from M. Homiack, dated September 09, 2009

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