

May 4, 2010

MEMORANDUM TO: Anthony C. McMurtray, Chief
Component Performance and Testing Branch
Division of Component Integrity
Office of Nuclear Reactor Regulation

FROM: Gurjendra S. Bedi, Mechanical Engineer */RA/*
Component Performance and Testing Branch
Division of Component Integrity
Office of Nuclear Reactor Regulation

SUBJECT: STAFF EVALUATION AND RESOLUTION OF THE PUBLIC
COMMENTS RELATED TO DRAFT REGULATORY ISSUE
SUMMARY 2010-XX, "INSERVICE INSPECTION AND TESTING
REQUIREMENTS OF DYNAMIC RESTRAINTS (SNUBBERS)

Enclosed is the staff evaluation and resolution of the public and Licensee Action Task Force Task comments received on proposed Generic Communication, Draft Regulatory Issue Summary 2010-XX, "Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers), published in the Federal Register (Volume 74, No. 226, Page 61715) on November 25, 2009.

Enclosure:
As Stated Above

CONTACT: Gurjendra S. Bedi, NRR/DCI
(301) 415-1393

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Staff Evaluation and Resolution of the Public and LATF Comments Received on Proposed Generic Communication, Draft Regulatory Issue Summary 2010-xx, "Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers)" published in the Federal Register Vol.74, No. 226, Page 61715 on November 25, 2009 (74 FR 61715)

No.	Commenter	Comment	Response
1.	M. J. Ajluni, Southern Nuclear Operating Co, Inc.	Please clearly articulate the current regulatory requirements applicable for functional testing of snubbers and its linkage to 10 CFR 50.55a. Describe any changes from previous regulatory requirements. (ML100540527)	The previous and current regulation at 10 CFR 50.55a(g)(4) requires that "Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) which are classified as ASME Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of the editions of the ASME BPV Code and addenda. ASME Section XI, Article IWF-5000 requires inservice examination and testing of snubbers. "Snubbers" are "supports," therefore, inservice examination and testing of snubbers are required by regulation 10 CFR 50.55a. 10 CFR 50.55a(b)(v) allows the optional use of the Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (snubbers) in Light Water Reactor Nuclear Power Plants," in lieu of the ASME Section XI. This RIS only reminds licensees of the existing regulatory requirements of the inservice examination and testing of snubbers. This RIS does not change or update any regulatory requirements related to inservice examination and testing of snubbers.
2.	Unknown (Received from Martin Murphy via e-mail dated January 6, 2010)	I don't understand the sentence "However, when these documents represent an alternative to the code requirements incorporated by reference in 10 CFR 50.55a, they must be authorized by the NRC...." Does this mean that some licensees have changed their snubber ISI code requirements in TRM since they think they control the TRM too? To change a TRM, the licensee has to go through 50.59, and all of the other regulatory kickouts and considerations (50.54(p), etc.). I did like to see this paragraph clarified. Are there smoking guns, and I mean plural? RIS mentioned "several instances." If this is a problem at only one or two plants, I am not sure that the RIS is the best means for addressing it. I did use a compliance hammer.	RIS paragraph is revised for clarity. Based on the NRC staff findings, the problem is not limited to one or two plants. This RIS does not provide any new or additional requirements related to the inservice examination and testing of snubbers. This RIS reminds the licensees about the existing regulation 10 CFR 50.55a. Most licensees' are following regulation 10 CFR 50.55a and include snubbers in their 10-year interval. In 2009, NRC staff noted that some licensees were not following 10 CFR 50.55a for their snubbers' inservice examination and testing, while implementing or updating their snubber programs or procedures on the 10-year required periodicity. However, the reported problems for snubbers have been limited in numbers and involved minimal safety issues. Most of the failed snubbers have been corrected or replaced in a timely manner and the nuclear industry has maintained good performance with their snubber programs. NRC staff concludes that this RIS, will provide the nuclear industry with an opportunity to update their snubber inservice examination and testing programs, as required by 10 CFR 50.55a.
3.	Licensees Action Task Force (LATF) meeting on January 21, 2010.	(1) Specify, if NRC made any changes to the current snubber inservice examination and testing requirements as specified in the current regulation 10 CFR 50.55a via this RIS. (2) Are there any licensees who are including snubbers in their 10-year interval? (3) Industry does not fully agree that snubber testing is required in accordance with 10 CFR 50.55a. (ML100850394)	

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4.	Gary Park, NextEra Energy LLC	This RIS will be outdated when the 2006 Addenda is incorporated into 10 CFR 50.55a. As in the 2006 Addenda of ASME Section XI, IWF-5000 was deleted (ML093430233).	The regulation 10 CFR 50.55a requires that ASME Section XI, 2004 Edition be used for inservice inspection and testing of snubbers with the option to use Subsection ISTD of the ASME OM Code, 2004 Edition. When 10 CFR 50.55a is updated to incorporate ASME Section XI, 2006 Addenda (which deletes snubber requirements), inservice inspection and testing of snubbers will be per the requirements of ASME OM, Subsection ISTD. Therefore, the requirements as specified in the RIS will never be eliminated or outdated.