

**Parks, Jazel**

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**From:** Burke, John  
**Sent:** Friday, June 04, 2010 1:12 PM  
**To:** Lin, Bruce  
**Subject:** FW: RG 1.54 public comments  
**Attachments:** Staff Responses to Public Comments.docx

My input on comment resolution, without Brian's input below.

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**From:** Lin, Bruce  
**Sent:** Thursday, June 03, 2010 11:26 AM  
**To:** Burke, John  
**Cc:** Koshy, Thomas  
**Subject:** RG 1.54 public comments

FYI, attached table contains all comments received plus Brian Sheron's comment below. I will prepare our responses in the next couple weeks.

Bruce

"This doesn't work for me. We should be saying that while the ASTM standard provides reasonable assurance that coatings left in service subsequent to a visual inspection will remain adhered under accident conditions, it does not provide conclusive assurance that degraded coatings will be detected by visual inspection. Therefore, the standard is acceptable for use in examine coating adhesion provided licensees also demonstrate that any degraded coating that might detach during accident conditions will be in a form (e.g. chips) such that they will not be transported to the sump."

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RG 1.54 Rev. 2  
Comparison of ASTM standards

ASTM Std		Comments		Resolution of Differences
Rev 1	Rev 2	Section	Specific Comment / Differences	RES Resolution
D3843-00	D3843-00 (Reapproved 2008)		Reapproved for 08. No change has been made	N/R
D3911-95	D3911-08	2	D3911-08 added D1193, D4538 & D 5144 to the referenced documents	Differences in references are acceptable
		3	D3911-08 added reference to D4538 for terminology	Technical edits
		4	Section 4.2 added to allow licenses develop appropriate acceptance criteria	Add acceptance criteria similar to D3911-95
		5	Sections 5.4, 5.5 & 5.6 added	Technical edits
		7	Minor changes in procedure	Changes are acceptable
		7.2.4	Spray solution temp requirement (70-80 Deg F) is removed	OK,
		9	No acceptance criteria specified. The license holder is responsible for establishing acceptance criteria	Add acceptance criteria similar to D3911-95
		11	Section 11.3 regarding significant/nonsignificant areas deleted	Acceptable
D5144-00	D5144-08	Intro	Minor changes in last paragraph	Technical edits
		2.1	Several references added including D3911, D3912, D5163, D7167, D7230, D7234, D7491& E684	Differences in references are acceptable.
		3	Section 3.2 of 00 version deleted	Ok, definitions are in D4538
		4.4	Section 4.4.2.3 added for coating condition assessment	
		4.4.3	Added D7167 & D7230	
		4.5	4.5.2 added	
		5.5.1	Split 5.5.1.1 into two parts, steel & concrete	
			Acceptance criteria changed from 3 tests to 4 of 5 tests	
		5.7.1	Added reference to test method E684	OK, consistent w/ANSI 5.12
		5.8	Section 5.8 added	
		6	Deleted section 6.1	
		6.4	Added reference to ASTM MNL8	
		7	Section 7 regarding thermal conductivity moved to 5.8	
		7 QA	Section 7.2 added	

D5139-96	D5139-10	2.1 2.2 3.2 4.3 7	Updated reference list Removed reference to SSPC standards New paragraph added to expand the usage of this standard Changed surface preparation requirements Changed section heading to "Surface Preparation", added instructions to specify surface preparation requirements	Changes are acceptable
D4082-95	D4082 -10	1.1 3 5 7.3 8 10	Scope changed to include Service Level III Added reference to D4538 for terminology Added "as approved by licensee" Paragraph revised Split examination and reporting into two separate sections Revised to allow licensee to specify acceptance criteria	
D4537 - 96	D4537 – 04a	1 2 3 4 5.3 6 7,8,9	1.2 and 1.3 are added together in 2004 version D 5144 added Added definitions for Level I, II, and III inspection and safety related coating system Section 4.5 added Added last sentence to provide more clarity Minor wording changes in several places, specifically section 6.4 added Level III shall have verifiable experience in the U.S. commercial nuclear power industry Minor wording changes	No change in intent of scope, therefore acceptable.
D5498 - 94	D5498 - 09	1 2 2.2 2.3 2 3 7	Section 1.3 added Added several standards to referenced document from D5163 to D7234 Section 2.2 added providing reference to ASME codes Added SP11 to SP15 and VIS 3 – VIS 5 Sections 2.5 & 2.6 added Wording changes in several places, no change in intent Section 7 of 09 version replaced Sections 7 & 8 of 94 version, Table 1 is deleted	Changes are acceptable
N/A	D7108-05		New standard added for establishing qualifications for nuclear coating specialist	Ok
D4227-95	D4227 -05		No change	N/R

D4228-95	D4228-05		No Change	N/R
D4286-96	D4286 - 08	2.2 3.1.4	Added NQA-1 to referenced document Added reference to NQA-1	Changes acceptable
D5163-91	D5163 - 08	Title 1.2 1.3 2  3  5 8 9 10.3 10.4 11	Title changed Last sentence, Level II changed to Level III Added for 08 version Several changes in referenced document. For example: 08 version does not have F1130 – F1133. D4121 is not in 08 version SSPC-VIS2 is in 05 version and not in 91 version. 2.4 NACE Standard is in 91 version and not in 08 version. In '08 version 3 is terminology, in 91 version 3 is significance of use. Minor wording change and Section 5.5 was added Section 8 is monitoring procedure instead of pre- monitoring procedure in previous version. Personnel qualifications and requirement changed significantly from previous version. Reference to F1130 – F1133 and D4121 deleted Added D6677 as an acceptable adhesion test method Deleted continuity testing (NACE RP0188-88) Section 11 (Evaluation) of 91 version was deleted	Differences in references are acceptable.  Does not affect technical content.  Technical edit  Do we agree with changes?
	D7167-05		New standard added for performance monitoring of SL III linings	Ok
D4541 - 95	D4541 - 09	1.1 1.2 2 6.5 6.7  7.1 8 10	Scope changed to metal only Added reference to D7234 Added para 1.2 and Note 2 Added D7234 & D691 to referenced document Note 4 is included after 6.5 Added discussion on scoring for thicker film coating and note 5 Added test methods E & F, test method A eliminated Added 8.5 This section has been revised significantly.	All changes are acceptable

		Annexes		
D3359-95	D6677-07		Test by adhesive tape is being replaced by knife test based on input from NRR & NUCC.	D6677 Knife test is considered more repeatable/reliable than the tape test.
	D7234-05		New standard added for pull-off adhesion strength on concrete	Ok
D3912-95	D3912-10	Title 1.1 1.2 & 1.3  2 3 6  7  Fig. 1	Added linings to the title Changed to reflect coatings use in Service Level 1 & II Sections 1.2 and 1.3 added to clarify this test method is intended to be a screening test and it addresses two exposure intervals (short term and long term). Added D7230 Section revised Section revised. New section included procedures for short term tests and long term tests New section divided into short term tests and long term tests Fig 1 deleted	
D5962-96	D7491-08			
D4538-95	D4538 - 05		05 version included scope, referenced document and terminology. Added/deleted definitions as appropriated.	OK
EPRI-109937 April 1998	EPRI-1019157 Dec. 2009 “Guideline on Nuclear Safety-Related Coatings” Revision 2, (Formerly TR-109937 and 1003102)	Scope  Chap 1  Chap 2  Chap 3  Chap 4	Scope of both reports is the same.  Entire Section 1.4 added to discuss Implementation of the 10 CFR 50, Appendix B Quality Assurance (QA) Program for Coatings.  No technical differences identified  New section added that discusses structural restoration  Section 4.1.2.4 “Interpretation of Test Reports” added.	No concerns/comments with Chapter 1& 2   Do not agree.  This provides acceptable guidance for content of a test report.

			<p>Section 4.1.4.1 "Thermal Conductivity was deleted.</p> <p>No significant technical changes were identified in the remainder of chapter 4.</p>	Appropriate information is in Section 4.1.2.2
		Chap 5	No concerns identified. EPRI NP-5652 is endorsed by GL 89-02.	
		Chap 6, 7	No concerns identified.	
		Chap 8	Section 8.13 was added to discuss life extension and the GALL. No concerns with this new section.	
		Chap 9	No concerns identified	
		Chap 10	No concerns identified.	