STATUS OF NRC ACTIVITIES OF POTENTIAL INTEREST TO OM MAIN COMMITTEE

Tony McMurtray, Chief
Component Performance & Testing Branch
Division of Component Integrity
NRC Office of Nuclear Reactor Regulation

ASME OM Code Committee Meeting on December 8-10, 2010, at Clearwater, FL

10 CFR 50.55a Rulemaking

The public comment period ended on July 19, 2010 for the proposed rule to amend 10 CFR 50.55a to incorporate by reference the 2005 and 2006 addenda of the ASME Operation and Maintenance (OM) Code, and the 2005 addenda through 2008 edition of ASME Boiler and Pressure Vessel (B&PV) Code (Sections III and XI). The final rulemaking is scheduled for completion by May 1, 2011. [Note that delays in publishing the 2009 Edition of the ASME OM Code caused the edition/addenda of the OM Code and B&PV Code incorporated in the regulations to be staggered.]

The NRC is planning to start the rulemaking to incorporate the 2009 Addenda and 2010 Edition ASME Section III and XI and the 2009 Edition of the ASME OM into 10 CFR 50.55a in January 2011 (**Note: 2009 Edition of the ASME OM Code is simply ASME OM without Code, Code word is entirely deleted from the document, this has created some confusion**). The 2011 Addenda of ASME Section III and XI might also be included when the "camera ready" version becomes available.

Regulatory Guide (RG) Update – OM Code Case Acceptability

Revision 3 of RG 1.193, "ASME Code Cases Not Approved for Use," was issued in October 2010. This revision addressed new and revised code cases published with the OM Code edition and addenda for 2002 through 2006.

The NRC staff has completed its review of the new and revised code cases published in the 2009 Edition of the ASME OM. The proposed rulemaking and RGs (Revision 1 of RG 1.192 and Revision 4 of RG 1.193) for the code cases published in the 2009 Edition of the ASME OM should be issued for public comment in the Spring of 2011. The NRC notes that the ASME OM Code has not consistently assigned revision numbers to code cases. For example, minor revisions were made to Code Case OMN-1 in the 2002 Addendum of the OM Code and Code Case OMN-1 was revised in its entirety in the 2006 Addendum of the OM Code. No revision numbers were assigned to OMN-1 in the 2002 or 2006 Addendum. There are two versions of OMN-1 in the 2009 Edition of the ASME OM (OMN-1 and OMN-1-1), and OMN-1-1 is described as Revision 1. This has created confusion when identifying a code case by a revision number in RG 1.192. Therefore, beginning with Revision 1 of RG 1.192, code cases will be numbered as the code case is described in the OM Code. Each code case in Revision 1 of RG 1.192 will be identified by the number assigned by the OM Code and the applicable edition or addendum of the OM Code.

Regulatory Issue Summary (RIS) 2010-06 and Enforcement Guidance Memorandum (EGM) 10-001 for Inservice Inspection and Testing Requirements of Snubbers

On June 1, 2010, the NRC issued RIS 2010-06 and EGM 10-001 related to the Inservice Inspection and Testing of Snubbers. The NRC discovered that some operating reactor licensees were not following the regulatory requirements for snubbers as specified in 10 CFR 50.55a.

RIS 2010-06 was issued to remind licensees of NRC's requirements described in 10 CFR 50.55a, for snubber inservice inspection and testing at nuclear power plants.

The EGM-10-001 was issued because the NRC's requirements for ensuring snubber inservice examination and testing programs are consistent with 10 CFR 50.55a (including requirements in the licensee's Code of Record) have not been clear. EGM 10-001 notes that the NRC will exercise enforcement discretion and not cite licensees for violations of requirements associated with snubber inservice examination and testing programs identified within six months of the issuance of RIS 2010-06 (June 01, 2010), provided the licensee (1) enters the noncompliances in their corrective action program, and (2) implements adequate compensatory measures for the noncompliances and appropriately evaluates any operability or functionality effects on structures, systems, or components. **This six month enforcement discretion period ended on November 30, 2010.** For licensees who meet the requirements for enforcement discretion discussed above, the six month enforcement discretion will be followed by an 18-month period of additional enforcement discretion for licensees to correct the identified noncompliances associated with their snubber inservice examination and testing. In 2011, the NRC plans to issue a Temporary Instruction (TI) inspection procedure to review the compliance of licensees' snubber programs with 10 CFR 50.55a requirements.

Draft NUREG-1946, "Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints"

Draft NUREG-1946 was developed to assist industry in establishing a basic understanding of the regulatory basis for pump and valve IST programs and snubber examination and testing programs. The NRC issued this draft NUREG in August 2010 for public comments and the public comment period ends on January 20, 2011. The information in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," Revision 0, issued April 1995, and Revision 1, issued January 2005, has described much of this topic in the past. However, NUREG-1946 replaces Revision 0 and Revision 1 to NUREG-1482 and is applicable, unless stated otherwise, to all editions and addenda to the OM Code, which Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(b) incorporates by reference.

Based on comments received internally from NRC staff and the nuclear industry, NRC staff plans to add much of the material from the existing NUREG-1482, Revision 1 back into NUREG-1946. These additions will include guidance on acceptable and unacceptable preconditioning of pumps and valves prior to tests conducted under the IST program. To support this activity, the NRC staff in the Component Performance and Testing Branch (CPTB) of the Office of Nuclear Reactor Regulation is reviewing each section of NUREG-1946 along with the existing sections of NUREG-1482, Revision 1.

Eleventh NRC/ASME Symposium on Valves, Pumps, and Inservice Testing

The NRC and ASME plan to jointly sponsor the eleventh NRC/ASME Symposium on Valves, Pumps, and Inservice Testing (IST) in the Maryland/Washington, DC area on August 15th and 16th, 2011. This Symposium provides for the exchange of information on technical, programmatic, and regulatory issues associated with the inservice testing of valves and pumps, and inservice examination and testing of snubbers in currently operating nuclear power plants. The Symposium will also include the discussion of valves, pumps, snubbers, and IST programs for new reactor designs and proposed reactor operating licenses. Individuals from the U.S. and other countries normally participate in the Symposium representing nuclear power plant licensees, consultants, valve, pump, and snubber vendors, and regulators. The Symposium also includes an interactive session where an NRC staff panel discusses established regulatory positions related to valves, pumps, snubbers, and inservice testing. The following are proposed milestones for the symposium:

Call for Papers	November 9, 2010
Abstract Deadline	December 17, 2010
Submittal of draft papers to Session Chairs	March 18, 2011
Submittal of Final Papers to NRC	May 13, 2011
NRC/ASME Symposium	August 15-16, 2011

Task Interface Agreement (TIA) 2010-001– Evaluation of Application of Technical Specification (TS) Surveillance Requirement (SR) 3.0.3, Surveillance Requirement Applicability

The NRC issued TIA 2010-001 on April 19, 2010 (ADAMS Accession # ML101100101) addressing the incorrect usage of TS SR 3.0.3 (**Note 1**) for a missed ASME OM Code inservice test, at the Clinton Power Station.

(**Note 1**: If it is discovered that a TS Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the Limiting Condition for Operation (LCO) not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. If the Surveillance is not performed within the delay period, the LCO must be immediately declared not met, and the applicable Condition(s) must be entered.)

NRC staff is preparing a generic communication to explain the operational impact of this TS interpretation. CPTB staff are working with the ASME OM Subcommittee on O&M Codes to develop two separate Code Cases to address requirements for inservice testing frequency and allowable testing graces periods and for missed inservice tests (i.e. tests not performed within the required testing frequency).

Generic Letter (GL) 96-05 Periodic Verification of Motor-Operated Valves (MOV)

GL 96-05 requested each plant to establish a program, or ensure the effectiveness of its current program, to verify on a periodic basis that safety-related MOVs continue to be capable of performing their safety functions within the current licensing basis of the facility. The industry responded to GL 96-05 by forming a Joint Owners Group (JOG) to address the concerns of the GL. Ninety-eight out of 103 plants participated in a five year test program. Participating plants were to develop an interim periodic verification test program which combines static and dynamic valve testing. The dynamic testing was completed over a five year span. The dynamic test data was used to determine a final test basis. Static testing continues to be performed at intervals based on risk and margin.

A final report with recommended actions was submitted to the NRC for review. The NRC approved the final report with conditions. Plants committed to implement the final program recommendations within six years from the date of NRC safety evaluation, September 25, 2006. Commitments by the plants included identifying MOVs not covered by the JOG MOV Periodic Verification (PV) Program and establishing a plant PV program for these MOVs. Plants were expected to submit to the NRC their PV plan for those valves not covered by the JOG MOV PV Program.

To date, the NRC has not received any documentation detailing a participating JOG plant plan for addressing valves not covered by the JOG MOV PV Program. CPTB staff, at the NRC, are exploring the possibility of issuing a Regulatory Information Summary (RIS) which would provide direction for acceptable methods for addressing periodic verification programs for valves not covered by the JOG MOV PV program (e.g. following the requirements of Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in Light-Water Reactor Power Plants OM Code-1995, Subsection ISTC". The proposed target completion date for this RIS is the end of 2011.

Risk-informing Special Treatment Requirements of 10 CFR 50.69

The NRC 50.69 working group, comprised of NRR headquarters staff, with regional participation, has developed a draft inspection procedure which will be shared with the nuclear industry at large (via NEI), in early 2011. The draft procedure draws in part from the ASME developed Part 29 (Standard), "Alternative Treatment Requirements for Risk-Informed Safety Class (RISC)-3 Pumps and Valves," as well as from insights gained through a review of the South Texas Project 50.69-like treatment program. The procedure focuses on the most risk significant aspects related to implementation of 10 CFR 50.69 (i.e., proper categorization of SSCs and treatment of RISC-1 and RISC-2 SSCs). Additionally, inspections will be performance based, with lower safety significant function SSCs, such as those classified RISC-3, not receiving a major portion of inspection focus unless adverse performance trends are observed. The NRC staff will be soliciting industry input after the draft inspection procedure is shared with NEI and will issue final procedure by the summer 2011. Using this process to develop the details provided in the inspection procedure, with industry stakeholder input, is viewed as an efficient vehicle for reaching a common understanding of what constitutes an acceptable treatment program for SSCs.

At this time no licensee has submitted an application requesting to implement 10 CFR 50.69, though at least one licensee has recently indicated an interest in submitting a pilot application.

Following the initial pilot application, lessons learned from the application review will be used to revise the associated industry guidance and RG 1.201. The staff recognizes the need for an effective, stable and predictable regulatory climate for the implementation of 10 CFR 50.69.

ASME-Related Generic Communications

ASME-related generic communications issued by (or in the process of being issued by) the Office of Nuclear Reactor Regulation (NRR) and Office of New Reactors (NRO) since the last report (June 2010) to the OM Standards Committee are listed below:

Bulletins

None

Generic Letters

None

Information Notices

IN 2010-11 (06/16/10):	Potential for Steam Voiding Causing Residual Heat Removal System Operability
IN 2010-13 (07/22/10):	Failure to Ensure That the Post-Fire Shutdown Procedures Can Be Performed
IN 2010-17 (09/10/10):	Common Cause Failure of Boiling-Water Reactor Recirculation Pumps with Variable Drives
IN 2010-20 (09/24/10)	Turbine-Driven Auxiliary Feedwater Pump Repetitive Failures
IN 2010-21 (10/06/10)	Crack-Like Indication in the U-Bend Region of a Thermally Treated Alloy Steam Generator Tube
IN 2010-22 (10/25/10)	Fuel Assemblies Damaged During Refueling Operations Due to Misalignment

Regulatory Issue Summaries

None

The full text of any of these NRC generic communications can be accessed by visiting the NRC's public website at http://www.nrc.gov/reading-rm/doc-collections/gen-comm/index.html.