

From: McMurtray, Anthony
Sent: Friday, February 04, 2011 3:07 PM
To: Ron Lippy
Cc: Bedi, Gurjendra; Caponiti, Kathleen
Subject: RE: Snubber question from a regulatory perspective

Ron,

Sorry that I have been delayed in getting a response back to you. The response has been delayed due to the weather and my desire to get insights from Gurjendra Bedi before I sent the response back to you.

Question: If a licensee's ten-year Inservice Testing (IST) interval (i.e. ASME OM Code) expires before the ten-year Inservice Inspection (ISI) interval (i.e. ASME B&PV Code (Section XI)), do the changes being made in 10 CFR 50.55a (to be issued in May/June 2011) require the licensee to update their snubber examination and testing program to Subsection ISTD of the ASME OM Code prior to the expiration of their ten-year ISI interval?

Answer: **No, based on the current and proposed future requirements in 10 CFR 50.55a, a licensee is not required to adopt the requirements in Subsection ISTD of the ASME OM Code until they adopt the 2006 Addenda or later Addenda or Editions of Section XI of the ASME B&PV Code during their ten-year update of their ISI Code. A licensee is expected to continue to follow the requirements of the currently adopted Edition or Addenda of Section XI of the ASME B&PV Code, for inservice examination and testing of snubbers, until they adopt the 2006 Addenda or later Addenda or Editions. No relief is required.**

Question: Can a licensee voluntarily adopt Subsection ISTD of the ASME OM Code for examination and testing of snubbers in lieu of current ten-year Subsection IWF requirements of Section XI of the ASME B&PV Code?

Answer: **Yes, currently per 10 CFR 50.55a, a licensee can voluntarily change their snubber examination and testing program from Subsection IWF of Section XI of the ASME B&PV Code to Subsection ISTD of the ASME OM Code. No relief is required.**

Question: Can a licensee perform a ten-year update of their IST program for pumps and valves (i.e. ASME OM Code) using the latest Editions or Addenda of the ASME OM Code, without updating their snubber examination and testing requirements?

Answer: **Yes. The snubber examination and testing requirements should follow the licensee's ten-year interval Edition or Addenda of Section XI of the ASME B&PV Code. The requirements for each ten-year interval for IST of pumps and valves falls under 10 CFR 50.55a(f) while the requirements for each ten-year interval for examination and testing of snubbers falls under 10 CFR 50.55a(g). Therefore, the pump and valve IST ten-year interval may not coincide with the ten-year interval for examination and testing of snubbers.**

Please let me know if you have any further questions or need any additional clarification regarding this issue.

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From: Ron Lippy [<mailto:rcl@tnorthconsulting.com>]
Sent: Friday, January 14, 2011 9:57 AM
To: McMurtray, Anthony
Subject: Snubber question from a regulatory perspective

Tony,

Sorry to bother you with a question and, I typically do not but, I was asked by a client of ours if I could get an "unofficial response" to a question which will probably be coming up as the year progresses. The question is, if I have an IST Interval that comes before the ISI Interval (in this case 4 years), is the new Federal Regulation being issued in May 2011 or so, going to require me to update my snubber testing to the OM Code and therefore be required prior to the ISI interval expiration or, am I going to be allowed to continue testing snubbers in accordance with Section XI, subsection IWF and not be required to update to the OM Code, subsection ISTD UNTIL the ISI interval expires? Will this require relief?

Thank you if you choose to answer this question and this will NOT be promulgated to the public as a NRC position or discussion. The issue in a nutshell is, can an IST Interval Update be submitted to the NRC per the CFR 50.55a using the OM Code 2005 addenda WITHOUT updating the snubber test requirements to the OM Code UNTIL the ISI interval starts? If you can give me a position (albeit unofficial), it would be much appreciated. Any help that you can provide or guidance would be most appreciated. Again, thank you, take care and have a great day.

Best Regards,

Ron Lippy

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Kathleen,

Please place this e-mail in ADAMS. I will provide you with a 665.

Tony

E-mail Properties

Mail Envelope Properties (C37FF65A70772549ACB9C5B6AD2BA05C0B6FF408B4)

Subject: RE: Snubber question from a regulatory perspective
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From: McMurtray, Anthony

Created By: Anthony.McMurtray@nrc.gov

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