

Code Requirements for Submittals and/or Approval by the NRC

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NRC Comment 1



- Regulatory requirements should be retained in Code
- Inclusion of “regulatory requirements” in ASME Code supports international Code users
 - Many regulators administer ASME Code in a manner consistent with NRC

NRC Comment 2



- Inclusion of “regulatory requirements” in ASME Code supports domestic Code users
- Removal of requirements from Code and placement in 10 CFR 50.55a would:
 - Increase number of conditions in regulation
 - Require significant expansion of the regulatory requirement to maintain legal , administrative, and technical connection to the Code paragraph(s) where they previously resided

NRC Comment 3

- Fragmentation of these requirements presents challenges to Code users:
 - Increases complexity of tracking and managing requirements
 - Increases potential for non-compliance
- Maintenance of existing, and consideration of new regulatory requirements, has successfully been addressed through the consensus process