

July 10, 2014

MEMORANDUM TO: Tara Inverso, Chief
Rulemaking Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Daniel I. Doyle, Project Manager /RA/
Rulemaking Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JUNE 26, 2014, PUBLIC MEETING TO DISCUSS A
PROPOSED RULE TO INCORPORATE BY REFERENCE
AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODES INTO
THE U.S. NUCLEAR REGULATORY COMMISSION REGULATIONS
(TAC NO. MF3530)

The U.S. Nuclear Regulatory Commission (NRC) held a Category 3 public meeting on June 26, 2014, to discuss an upcoming proposed rule to incorporate by reference American Society of Mechanical Engineers (ASME) codes into NRC regulations. The public meeting was held at the Bethesda North Marriott Hotel and Conference Center in North Bethesda, Maryland. The purpose of the meeting was to discuss and receive feedback on: (1) proposed NRC conditions on the use of the Code for Operation and Maintenance of Nuclear Power Plants (OM Code) and (2) NRC approval for use of the quality assurance standard NQA-1.

The meeting was attended by 57 individuals including industry representatives and NRC staff. Of the 57 participants, 12 participated in the meeting by telephone.

The NRC presentation slides are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML14170A114.

The major areas of discussion are summarized below:

NRC Presentation

The NRC staff presentation included discussion of the following topics:

- Proposed Rulemaking Overview
- NQA-1 Quality Assurance Requirements
- Proposed OM Code Conditions

CONTACT: Daniel I. Doyle, NRR/DPR
301-415-3748

Open Discussion

The NRC staff stated that the comments and suggestions provided by the attendees would be considered in preparing the proposed rule, but that the NRC would not prepare formal responses.

Comments and suggestions provided by the attendees during the public meeting included the following:

1. The slide presentation indicated that the NRC staff was considering a condition on the implementation of Appendix III, "Preservice and Inservice Testing of Active Electric Motor Operated Valve Assemblies in Light-Water Reactor Power Plants," to the ASME OM Code to allow the categorization of components by use of ASME OM Code Case OMN-3, "Requirements for Safety Significance Categorization of Components Using Risk Insights for Inservice Testing of [Light Water Reactor] Power Plants," as accepted in NRC Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," or a plant-specific or industry-wide method as accepted in the applicable NRC safety evaluation. One attendee recommended that the process for component categorization be specified to follow the provisions in Subsection ISTE, "Risk-Informed Inservice Testing of Components in Light-Water Reactor Nuclear Power Plants," of the ASME OM Code as an improvement to the categorization process. Another attendee indicated that some licensees currently follow a categorization process developed by the Joint Owners' Group that does not match the method in Code Case OMN-3 or Subsection ISTE, such that the use of a plant-specific or industry-wide categorization method should remain an option.
2. The slide presentation indicated that the NRC staff was considering a condition for inservice testing (IST) programs in new reactors to require monitoring for potential flow-induced vibration (FIV). In response to a question from an attendee on the basis for this condition, the NRC staff discussed plant experience with damage to components in the reactor coolant and steam systems of nuclear power plants as a result of FIV effects during initial power uprate operation. The intent of this condition is to identify the FIV issue as an important consideration for new reactors during their initial startup test programs.
3. The slide presentation indicated that the NRC staff was considering a condition for the IST program in new reactors to require testing of check valves in both directions. In response to a question from an attendee on the basis for this condition, the NRC staff discussed the Commission papers on new reactors that specified that new reactors should provide for bi-directional testing of check valves. This provision in the Commission papers was the result of operating experience that revealed that testing of check valves in only one direction might be inadequate to verify the structural integrity of the check valve disc assembly.
4. The NRC slide presentation indicated that no significant changes were planned to the conditions in Title 10 of the Code of *Federal Regulations* (10 CFR), Section 50.55a on the use of Appendix II, "Check Valve Condition Monitoring Program," to the ASME OM Code. An attendee stated that Appendix II to the ASME OM Code had been revised to address the

conditions on its use specified in 10 CFR 50.55a. Therefore, the attendee suggested that the current conditions in 10 CFR 50.55a might not be needed for Appendix II in the recent editions and addenda of the ASME OM Code.

5. The NRC slide presentation indicated that the NRC staff was considering a condition to require that a nuclear power plant applicant or licensee receive authorization to implement Subsection ISTE as an alternative under 10 CFR 50.55a prior to its use. In response to a question from an attendee, the NRC staff stated that the Statement of Considerations for the proposed rule will provide information on specific aspects that will need to be addressed by an applicant or licensee in its request to implement Subsection ISTE as an alternative to the IST provisions in the other subsections of the ASME OM Code.
6. The slide presentation indicated that the NRC staff was considering modifications to the upper limits of the acceptance criteria for pump testing in Subsection ISTF, "Inservice Testing of Pumps in Light-Water Reactor Nuclear Power Plants – Post-2000 Plants," of the ASME OM Code. The basis for the modifications is the omission of a provision in Subsection ISTF for the implementation of Appendix V, "Pump Periodic Verification Test Program," of the ASME OM Code. An attendee suggested that the condition in 10 CFR 50.55a specify the implementation of Appendix V when applying Subsection ISTF rather than modifying the pump test acceptance criteria.
7. Paragraph (f) in 10 CFR 50.55a specifies the implementation of the IST provisions in the ASME OM Code. An attendee noted that the ASME OM Code also includes preservice testing (PST) provisions. To be consistent with paragraph (g) in 10 CFR 50.55a that addresses both preservice inspection (PSI) and inservice inspection (ISI), the attendee suggested that paragraph (f) be revised to reference both the PST and IST provisions of the ASME OM Code.
8. The slide presentation indicated that the NRC staff was considering a modification to paragraph (f) in 10 CFR 50.55a regarding the scope of the IST program for Class 1, 2, and 3 components to also address the scope specified in Subsection ISTA, "General Requirements," of the ASME OM Code. Some attendees raised concerns regarding the potential expansion of the IST program scope beyond Class 1, 2, and 3 components if the scope language in paragraph (f) is modified. Other attendees recommended that the IST scope of paragraph (f) in 10 CFR 50.55a match the scope of the ASME OM Code because the reference to Class 1, 2, and 3 components in paragraph (f) is outdated as based on the original specification of IST provisions in Section XI of the ASME Boiler & Pressure Vessel Code.
9. One attendee requested whether 10 CFR 50.55a could be reformatted to improve its readability. The NRC staff stated that the ongoing revision to 10 CFR 50.55a to incorporate by reference the most recent regulatory guides addressing ASME Code Cases will provide some readability improvements (such as specifying titles for individual paragraphs and conditions). However, the staff noted that there are limitations to the amount of formatting that can be accomplished within the NRC portion of the Code of Federal Regulations.
10. One attendee suggested that the regulations only incorporate by reference the 2012 Edition of the ASME OM Code rather than also the 2009 Edition and 2011 Addenda.

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11. One attendee suggested that the condition to supplement ISTC-3700 on valve position verification testing for new reactors is redundant to the ASME OM effort to improve this code provision.

Enclosure:
List of Attendees

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11. One attendee suggested that the condition to supplement ISTC-3700 on valve position verification testing for new reactors is redundant to the ASME OM effort to improve this code provision.

Enclosure:
List of Attendees

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Presentation Slides ML14170A114

NRC-001

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NAME	DDoyle	GLappert	TInverso	DDoyle
DATE	07/03/2014	07/10/2014	07/10/2014	07/10/2014

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LIST OF MEETING ATTENDEES

Name	Organization
Jason Carneal	U.S. Nuclear Regulatory Commission (NRC)
Daniel Doyle	NRC
Jason Eargle	NRC
Keith Hoffman	NRC
John Huang	NRC
Tara Inverso	NRC
Richard McIntyre	NRC
Seung Min	NRC
Mary Jane Ross-Lee	NRC
Thomas Scarbrough	NRC
Fred Schofer	NRC
David Terao	NRC
John Tsao	NRC
Robert Wolfgang	NRC
Michael J Barlok	Tennessee Valley Authority (TVA)
Paul Bellard	Public Service Electric and Gas Company
Holly Krause Browner	Arizona Public Services (APS)
Augustine Cardillo	Westinghouse
Wei-Wu Chao	Taiwan Atomic Energy Council
Shawn Comstock	True North Consulting
Kevin L. Cortis	Dominion
Domingo A. Cruz	APS/ASME OM
Jerry Daniels	Southern Nuclear
Artin Dermenjjan	ASME OM Main Committee
Kevin G. DeWall	Idaho National Laboratory
Bradley Fox	Palo Verde Nuclear Generating Station
Tony Glass	Entergy
Mark Gowin	TVA
Masao Honjin	Electric Power Research Institute (EPRI) International
Ed Hyland	Duke
Charlie Kim	Westinghouse
John Kin	Dominion
Ron Lippy	True North Consulting
Dean Lurk	Exelon Generation
Mark A. McDaniel	Enercon Services - Vogtle 3&4
Mel McGaha	Iddeal Solutions
Chuck Reames	CB&I
Curt Reynolds	Exelon
Earl Ridgell	TVA
Wayne Rogers	Duke Energy
Tom Sanders	FPL & ASME
Brad Stockton	Iddeal Solutions
Claude Thibault	Wyle/NTS
Steven Unikewicz	Alion
Gilbert Zigler	ASME OM

Note: Twelve other individuals participated by telephone, but their names and affiliations were not collected.

ENCLOSURE