

# PUBLIC SUBMISSION

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Incorporation of American Society of Mechanical Engineers Codes and New and Revised ASME Code Cases

**Comment On:** NRC-2011-0088-0003

Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases

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## General Comment

In the proposed rule, the NRC has not removed the condition set in (b)(2)(xxvi) which requires that the licensee must apply the repair/replacement provisions in IWA-4540(c) of the 1998 Edition of ASME Section XI. Requiring a VT-2 for R/R activities of mechanical connections does not provide a compensating factor of safety to plant personnel. Persons in addition to operators, such as, the ANII and VT-2 qualified inspector are required and for systems where dose is a concern, the potential for an increase of total plant dose and personnel contamination is unnecessarily applied by this condition. This is in direct conflict with ALARA. All plants monitor for leakage and all plants require that walk downs following R/R activities, welded and mechanically connected joints are conducted to verify no leakage.

Plant Operations also conduct daily walk downs of the plant equipment that is not within containment further enhancing the visual detection of leakage regardless if the connections are new or not.

The requirement for performing a pressure test on mechanical connections, essentially, only provides verification that the gasket (a code exempt part) is performing its intended function.

To sum up, the NRC should remove the condition set in (b)(2)(xxvi) which requires licensee must apply the repair/replacement provisions in IWA-4540(c) of the 1998 Edition of ASME Section XI as the condition does not provide a greater benefit to the plant and does result in unnecessary added dose and possible contamination which is in direct contrast to ALARA.