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November 30, 2015

Secretary,
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

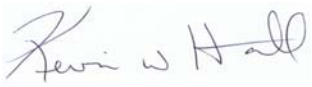
Subject: Public Comments on Proposed Rulemaking to Amend 10 CFR 50.55a, Document Citation 80 FR 56819, Agency Docket Number NRC-2011-0088

Enclosure: Comments on Proposed 50.55a Rulemaking

Dear Secretary, U.S. Nuclear Regulatory Commission

As noticed in the Federal Register on September 18, 2015, the subject proposed rulemaking has been published for public comment. In our review of the proposed changes to 10 CFR 50.55a, Iddeal Solutions offers the following comments for your consideration.

Very Truly Yours,



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Enclosure
Comments on Proposed Rulemaking for 10 CFR 50.55a

50.55a(a)(1)(i)

Proposed Change:

The NRC proposes to clarify that Section III Nonmandatory Appendices are not incorporated by reference. This language was originally added in a final rule published on June 21, 2011 (76 FR 36232); however, it was omitted from the final rule published on November 5, 2014 (79 FR 65776). The NRC is correcting the omission by inserting "(excluding Non-mandatory Appendices)" in 10 CFR 50.55a(a)(1)(i).

Comment:

(1) The proposed change is unclear as to the impact to the industry. The proposed change, as written, implies that the NRC is not approving the Section III Nonmandatory Appendicies for use. If the NRC chooses to exclude Section III Nonmandatory Appendicies, the rule change should clarify how they are to be used, also

(2) Prior to the proposed change, it appears that the Section III Nonmandatory Appendicies were approved because they were not specifically excluded from the NRC's incorporation of Section III by reference. Therefore, it seems that the proposed change to 50.55a(a)(1)(i) is retroactively removing the Nonmandatory Appendicies from 50.55a. Licensees have, and in good faith, used the Section III Nonmandatory Appendicies because their use was not prohibited in 10 CFR 50.55a, and Section III incorporation into 10 CFR 50.55a did not exclude them. The NRC should consider making the change effective only to Edition/Addenda that are added during and after the proposed change, or provide a bases and impact evaluation for rescinding the NRC's approval of previously approved Section III Nonmandatory Appendicies.

50.55a(a)(1)(ii)

Proposed Change:

The NRC proposes to revise 50.55a(a)(1)(ii) to clarify that Section XI Non-mandatory Appendix U of the 2013 Edition of ASME BPV Code Section XI is not incorporated by reference and therefore not approved for use. The NRC is developing an integrated approach to the issue of operational leakage. The NRC has not completed its determination of how Appendix U fits into this integrated approach to address the

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operational leakage issue at nuclear power plants. The operational leakage issue has many factors that need to be considered such as acceptance criteria, corrective actions, application of repair/replacement requirements, component operability determination, concerns related to continued operation, maximum acceptable leakage rates, flaw growth rates, flaw measurement techniques, schedules for eliminating leakage, and when or if the leakage requires authorization by the NRC. The NRC plans to complete the development of the regulatory approach to operational leakage and issue it in a future rulemaking.

Comment:

Nonmandatory Appendix U is the incorporation of Code Cases N-513-3 and N-705 (the white paper included these two code cases as reference). The ASME record indicates the two code cases were incorporated without any technical changes. Code Case N-513-3 is listed in Table 2 and Code Case N-705 is listed in Table 1 of Regulatory Guide 1.147.

It is understood that the NRC has a broad focus on the impact of operational leakage on plant safety. However, we also understand that the ASME focus is limited to the structural integrity of the pressure boundary. The requirements of Code Case N-513-3 and N-705 which are now Nonmandatory Appendix U provide technically acceptable methods for assessing the structural integrity of degraded pressure boundary. While these requirements may not address all of the NRC's broader concerns, they do address important elements of the NRC's focus. To withhold NRC approval of Nonmandatory Appendix U seems to be inconsistent with the reason for updating the licensee's ASME Section XI programs to use the most recent and improved technology. When the NRC fully develops its integrated approach, referral to ASME Section XI, Nonmandatory Appendix U seems appropriate for that portion of the integrated approach focusing on structural integrity. It would be beneficial to the industry for the NRC to reconsider incorporation of Nonmandatory Appendix U, with conditions if necessary.

50.55a(b)(2)(ix)(H)

Proposed Change:

No change is proposed by the NRC.

Comment:

This condition may be confusing as it could be interpreted to mean that each time the connection is disassembled it requires a VT-3 examination where the intent is only to examine the connection once per interval even if disassembled more often. Propose to

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revise the condition to state "Containment bolted connections that are disassembled during the inspection interval shall be examined at least once with the connection disassembled using the VT-3 examination method. Flaws or degradation identified during the performance of a VT-3 examination must be examined in accordance with the VT-1 examination method. The criteria in the material specification or IWB-3517.1 must be used to evaluate containment bolting flaws or degradation. If the containment bolted connection is not disassembled during the inspection interval, the bolted connections shall be examined with the bolting in place at least once during the inspection interval."

50.55a(b)(2)(xviii)(D)

Proposed Change:

The NRC proposes to add a new paragraph, § 50.55a(b)(2)(xviii)(D), to prohibit applicants and licensees from using the ultrasonic examination nondestructive examination (NDE) personnel certification requirements in Section XI, Appendix VII and subarticle VIII-2200 of the 2011 Addenda and 2013 Edition of the ASME BPV Code. Section 50.55a(b)(2)(xviii) currently includes conditions on the certification of NDE personnel. In addition, the new paragraph would require applicants and licensees to use the 2010 Edition, Table VII-4110-1 training hour requirements for Levels I, II, and III ultrasonic examination personnel, and the 2010 Edition, subarticle VIII-2200 of Appendix VIII prerequisites for personnel requirements.

Comment:

(1) The NRC's basis for the condition is that the changes made in the 2011 Addenda would allow for reduced training which results in less experience and exposure to representative flaws in representative materials common to the operating power plants. However, by replacing any or all of the field experience for Level I with laboratory experience and reducing the Level II field experience based on a portion being obtained in a laboratory, actually provides for improved experience.

Due to the small number of flaws actually detected during ISI ultrasonic examinations, it is conceivable that candidates for Level I and II certification can obtain the required hours of field experience (2010 Edition and earlier) and never scan a weld that contains an inservice flaw. By replacing all or a portion of the historical in-plant field experience with laboratory experience ensures candidates are exposed to conditions representative of plant conditions and flaws representing inservice flaws. For Level II, the change made in the 2011 Addenda still requires 80 hours of field experience in addition to the laboratory

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experience and is required to represent flaws in materials comparable to those in actual power plant components. Additionally, final evidence of skills and knowledge is demonstrated by testing and Appendix VIII demonstration.

It seems that the ASME has taken actions to address the diminishing NDE force and to eliminate excessive burden that may not contribute to the actual skills of UT personnel and replace it with focused experience that will actually improve the skills of UT examiners.

It is requested that the NRC reconsider the proposed condition because the changes may actually improve the talents and skills of candidates for Level I and II in the ultrasonics method as would be determined by their testing and demonstration.

(2) After considering comment (1) if the NRC chooses to maintain the proposed condition, the NRC is encouraged to permit the 2011 Addenda and 2013 Edition of Appendix VII be used for Level I candidates.

Because of shortened outages and budgetary restrictions, it is difficult for contractors to staff outages with Trainees that are working as candidates for Level I. Because of the limited duties of Trainees, it seems appropriate that their experience can be obtained in laboratory conditions for advancement to Level I. Noting the restrictions in IWA-2330, Level I personnel are limited to performing specific setups, calibrations, examinations, and the recording of data under the guidance of a Level II or Level III. Level I personnel are not permitted to evaluate or accept the results of a nondestructive examination.

Permitting candidates for Level I certification to credit laboratory experience as described in the 2011 Addenda and 2013 Edition will significantly assist the industry in the progression of NDE personnel certification without diminishing the quality of NDE in plant activities.

50.55a(b)(2)(xxx)

Proposed Change:

The NRC proposes to add 50.55a(b)(2)(xxx) to require a full length examination of 100 percent of the tubing in each newly installed steam generator prior to plant startup. This requirement would be instead of the unapproved provisions in IWB-2200(c) pertaining to steam generator tube preservice inspections (PSI).

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Comment:

The basis for the proposed change is that the Code (IWB-2200(c)) refers to the plant Technical Specifications for preservice, however the plant Technical Specifications do not address preservice examination. The proposed change, as written in 50.55a(b)(2)(xxx), only clarifies that 100% of the full length of each tube of new steam generators shall be examined prior to plant start up. Unfortunately, unlike IWB-2200(a) which requires the examinations of the Article be performed for preservice, IWB-2200(c) refers to the plant Technical Specification for preservice, thus the inservice criteria of Examination Category B-Q is not applied to the preservice of Steam Generator Tubes. And if the NRC's assessment is correct and the plant Technical Specifications do not address preservice, then the NRC's proposed change does not address the lack of examination and acceptance criteria being specified. To fully address the NRC's bases for the proposed change, additional information should be added to 50.55a(b)(2)(xxx) to specify the examination criteria and acceptance criteria, or that the examination is to only record pre-existing conditions that can be compared to the inservice examinations required by plant Technical Specifications.

50.55a(b)(2)(xxxiii)

Proposed Change:

The NRC proposes to add 50.55a(b)(2)(xxxiii) to prohibit the use of Appendix G Paragraph G-2216 in the 2011 Addenda and later editions and addenda of the ASME BPV Code, Section XI. The 2011 Addenda of the ASME BPV Code included, for the first time, a risk-informed methodology to compute allowable pressure as a function of inlet temperature for reactor heat-up and cool-down at rates not to exceed 100 degrees F/hr (56 degrees C/hr). This methodology was developed based upon probabilistic fracture mechanics (PFM) evaluations that investigated the likelihood of reactor pressure vessel (RPV) failure based on specific heat-up and cool-down scenarios.

Comment:

Rather than prohibit its use, can the NRC provide approval with conditions that requires the licensee to obtain prior approval by the NRC of the methodology and results. The condition can also require the licensees to demonstrate that no surface breaking flaw exists within the IWB-2500 inspection volumes for the RPV beltline. These conditions would address the basis for the staff's negative vote on the proposed ASME action.

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50.55a(b)(2)(xxxiv)

Proposed Change:

The NRC proposes to add 50.55a(b)(2)(xxxiv) to require that when using the 2013 Edition of the ASME BPV Code, Section XI, the licensee shall use the acceptance standards of IWD-3510 for the disposition of flaws in Category D-A components (i.e., welded attachments for vessels, piping, pumps, and valves).

Comment:

The NRC is correct; Table IWD-3401-1 was published in error. The action as passed (Record 09-794) included the correct reference to IWD-3510 and not IWB-3510. The ASME has been notified of this error and an erratum is to be published. The erratum has been approved by the ASME under records 14-1395 and 14-776 during the May 2014 meeting and it is shown twice in the minutes. It is recommended that the NRC not issue the condition as it will add confusion to the readers without the history of the error being part of the condition.

50.55a(b)(3)(xi)

Proposed Change:

The NRC proposes to add 50.55a(b)(3)(xi) to require that licensees supplement the ASME OM Code provisions in Subsection ISTC-3700, "Position Verification Testing," as necessary to verify that valve operation is accurately indicated. The ASME OM Code, Subsection ISTC-3700 requires valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve operation is accurately indicated.

Comment:

(1) Because of the significance of implementing the condition, as stated, for 50.55a(b)(3)(xi), some licensees may need time to revise or create procedures to govern the implementation requirements for this 'condition'.

(2) What allowances will be given by the NRC for compliance, and does this 'condition' apply to 'all licensees' whether they are updating to the 2012 Edition, or does it only apply to plants 'when' they update to the 2012 Edition of the ASME OM Code? If it is the NRC's intent to implement this condition in the licensee's current interval, there appears to be inadequate justification for such a

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radical change and there are inadequate provisions for implementation considering the level of effort to implement and the impact to station activities.

(3) Because of the significance of implementing the condition of 50.55a(b)(3)(xi) and that some licensees may have already started their update process (see comment on 50.55a(f)(4)(ii) and 50.55a(G)(4)(ii)), for licensees that will be updating to the 2012 Edition of the ASME OM Code within 24 months of the rulemaking, it seems appropriate to allow additional time to meet the condition. It is suggested that licensees updating to the 2012 Edition of the ASME OM Code within 24 months of the rulemaking be given an additional 24 months to implement the condition of 50.55a(b)(3)(xi) or identify, prepare and submit any necessary requests for alternatives in accordance with 10 CFR 50.55a(z).

(4) For passive valves, the condition of 50.55a(b)(3)(xi) will require verification of obturator movement while performing ISTC-3700 using flow, level indication, or temperature, etc., other than lights. Many systems contain passive valves that are out of service during refueling outages which is when these tests are typically performed. The condition of 50.55a(b)(3)(xi) may require the system to be in service during testing and could affect normal operations of the plant, require abnormal system alignment or operation, and result in additional radiation exposure. Based on the industry's experience with incidents of stem and disc separation in passive valves, this added burden seems excessive without a compensating increase in safety. Operating experience from the failure at BFN, and other plants, indicates the failure is attributed to high flow conditions over long periods where the disc separated from the stem while the valve was being used to throttle flow. This failure has not been attributed to normally closed valves that are only opened under administrative control, as is the service condition for most Passive valves, where the ISTC-3700 requirements would also apply in this case. It is suggested that the proposed condition be limited to active valves and excluded from passive valves.

10 CFR 50.55a(b)(3)(iv)

Proposed Change:

The NRC proposes to revise § 50.55a(b)(3)(iv) to specify that Appendix II in the 2003 Addenda through the 2012 Edition of the OM Code is acceptable for use without conditions with the clarifications that (1) the maximum test interval allowed by Appendix II for individual check valves in a group of two valves or more must be supported by periodic testing of a sample of check valves in the group during the allowed interval and (2) the periodic testing plan must be designed to test each valve of a group at approximate equal intervals not to exceed the maximum requirement

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interval. The conditions currently specified for the use of Appendix II, 1995 Edition with the 1996 and 1997 Addenda, and 1998 Edition through the 2002 Addenda, of the OM Code remain the same in this proposed rule.

Comment:

Based on the new requirements or modifications for Appendix II Check Valve Condition Monitoring, the proposed changes may still allow a group of 4 valves to be tested at the same time on a 16 year interval while testing each valve at an approximate equal interval (16 Years) not to exceed the maximum interval. As an example a licensee could test a group of 4 valves every 4th refueling outage, at the same time, based on a 16 year interval and 2 year fuel cycle and still be in compliance with your changes. Was the intent of this condition to require one valve from each group be inspected individually, with the remaining members of the group inspected in equal increments of the overall interval? In other words, a group of 4 valves on a 16 year interval per Table II-4000-1, should have one valve from the group inspected every 4 years, on a staggered basis, based on a 2 year fuel cycle i.e. A-B-C-D-A-B-C-D.

50.55a(b)(2)(xxxvii)

Proposed Change:

The NRC proposes to add 50.55a(b)(2)(xxxvii) to allow licensees to use the provisions of ASME BPV Code Case N-824, "Ultrasonic Examination of Cast Austenitic Piping Welds From the Outside Surface Section XI, Division 1," subject to NRC-proposed conditions of § 50.55a(b)(2)(xxxvii)(A) through (E), when implementing inservice examinations in accordance with the ASME BPV Code, Section XI requirements.

Comment:

In the NRC's request for comments, Section VI, "Specific Request for Comments" the NRC solicited industry input regarding how N-824 is incorporated by reference as either a permissive or mandatory requirement. If the NRC concludes that N-824 should be mandated, it seems appropriate that there be an implementation schedule as many licensees may have already established their NDE service contracts, budgets and staffing when the rulemaking is published. To implement Code Case N-824 may alter outage planning, budgeting and other preparations required to perform these examinations.

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50.55a(f)(4)(i), 50.55a(f)(4)(ii), 50.55a(G)(4)(i), and 50.55a(G)(4)(ii)

Proposed Change:

Remove the revisions for Regulatory Guides 1.192 and 1.147.

Comment:

This comment is applicable to 50.55a(f)(4)(i), 50.55a(f)(4)(ii), 50.55a(G)(4)(i), and 50.55a(G)(4)(ii), but is not related to the proposed change.

50.55a(f)(4)(i), 50.55a(f)(4)(ii), 50.55a(G)(4)(i), and 50.55a(G)(4)(ii), in part, requires the initial and successive 120 month intervals to comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (a) of the section 12 months before the start of the initial or successive 120-month interval.

Developing the Code programs for the initial interval or the updating of the programs for successive intervals is extensive and requires a significant effort to identify the Code requirements with their regulatory conditions and incorporate those changes into the ISI/IST programs and the numerous implementing procedures. Additionally, for updating successive intervals, there may also be plant documents such as work orders or repair/replacement plans that have already been prepared that will have to be revised to incorporate the new Code requirements if the work activity is to be performed in the new interval. And, in addition to the program changes, extensive training is sometimes required.

Due to the level of effort required to develop an initial program or complete a ten year update, the project is typically started 18 to 24 months before the initial or new successive interval is started. Because the regulation requires the licensee to adopt the latest Edition/Addenda incorporated by reference 12 months before the start of the new interval, the licensee is required to predict what that Edition/Addenda may be. As an example, there are licensees who have started the update process and have expended substantial efforts and expenditures to develop updated programs based on the 2007 Edition with 2008 Addenda of ASME Section XI that are concerned that a revised 50.55a may be published in a time frame that will require their update to meet the 2013 Edition. This will either result in significant rework or a request for alternative seeking NRC approval to continue with the 2007 Edition with 2008 Addenda.

To further complicate the coordination of the license's ten year update with the regulations, is the NRC's expectation that request for alternatives submitted under 10 CFR 50.55a(z) be docketed at least 12 months prior to the requested approval date, to allow sufficient time for NRC review. In order for the licensee to meet this expectation,

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these requests must be identified and prepared before the latest Edition/Addenda of the Code is confirmed in the 50.55a that is in effect 12 months before the start of the new interval. Again, this requires the licensee to predict what Edition/Addenda will be incorporated by reference 12 months prior to the start of the new interval.

It is requested that 50.55a(f)(4)(i), 50.55a(f)(4)(ii), 50.55a(G)(4)(i), and 50.55a(G)(4)(ii) be revised from 12 months before the start of the 120-month interval to 24 months before the start of the 120-month interval.

Allowing the licensee to establish the new Edition/Addenda of the Code for the new interval 24 months before the interval start date provides sufficient time to develop and implement the ten year update and docket requests for alternatives meeting the NRC 12 month expectation without risk of the Code Edition/Addenda being changed before the new interval starts.

This change does not affect augmented requirements contained in 10 CFR 50.55a(f)(6) and (g)(6) that the NRC sometimes uses to address industry safety concerns.

50.55a(g)(4)(ii)

Proposed Change:

Remove the revisions for Regulatory Guides 1.192 and 1.147.

Comment:

This comment is applicable to (g)(4)(ii), but is not related to the proposed change.

50.55a(g)(4)(ii) requires the licensee to update their ASME Section XI programs to the latest Edition of the ASME Section XI Code that is incorporated by reference in paragraph (a) every 120 months. Because of this requirement and the varying interval dates among the industry, the ASME Section XI, Mandatory Appendix VIII programs are becoming complex and eventually impossible to maintain. If the proposed rule is published as-is, the licensee's will be implementing ASME Section XI Appendix VIII meeting the 1995 Edition through the 2001 Edition, or the 2007 Edition with the 2008 Addenda, or the 2013 Edition.

Because of the complexity and cost of implementing Mandatory Appendix VIII, it is impossible for each plant to maintain its own individual Mandatory Appendix VIII program to meet its specific Code Edition and Addenda that is required by regulation. As a result, the industry has developed the Performance Demonstration Initiative (PDI) which is managed by EPRI to provide a consolidated program that meets Mandatory

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Appendix VIII. However, with the varying Editions and Addenda now being approved by regulations, it is becoming impossible to maintain one program that meets all the different Code Editions/Addenda.

It is recommended that 50.55a contain a provision that permits the licensee to use the latest Mandatory Appendix VIII incorporated into 50.55a by reference with the applicable NRC conditions regardless of the Code Edition/Addenda being used for the ASME Section XI Inservice program. Because this is a permissive statement and not a requirement, it will be left to the industry to coordinate their conformance to the latest Appendix VIII to allow the PDI program to be written and implemented to one Code Edition.

This may also have other benefits such as quicker access/implementation of the newer technology such as Supplement 9, when published, for examination of CASS. This means that licensees may be implementing Supplement 9 as soon as it is included by reference into 50.55a rather than waiting for their 10 year update.

50.55a(g)(6)(ii)(D)(4)

Proposed Change:

The NRC proposes to adopt a new condition (to be included in proposed 50.55a(g)(6)(ii)(D)(4)) to define surface examination acceptance criteria. Paragraph -3132(b) of ASME BPV Code Case N-729-4 sets forth the acceptance criteria for surface examinations. In general, throughout Section XI of the ASME BPV Code, the acceptance criteria for surface examinations default to Section III, Paragraph NB-5352, "Acceptance Standards". Typically, for rounded indications, the indication was only unacceptable if it was greater than 3/16-inch in size. The NRC requested that the code case authors include a requirement that any size rounded indication causing nozzle leakage is unacceptable due to operating experience identifying PWSCC under rounded indications less than 3/16-inch in size.

Comments:

In the NRC's basis for the change, the NRC states "In general, throughout Section XI of the ASME BPV Code, the acceptance criteria for surface examinations default to Section III, Paragraph NB-5352, "Acceptance Standards". By reviewing the 2013 Edition of the Section XI, this statement cannot be confirmed. There is a general reference to Section III in IWA-3100(b) when Section XI does not contain acceptance standards and there are general references to Section III in IWA-4000 and that reference is for repair/replacement activities and it refers to the Construction Code or Section III. For inservice examinations, ASME Section XI contains acceptance criteria for surface

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examinations and does not seem to refer to Section III. It should also be noted, that the Section XI acceptance criteria for surface examination only addresses linear indications and does not provide for the rejection of rounded indications.

However, with this said, if the NRC chooses to impose the acceptance criteria of NB-5352, it would be clearer if the year and addenda of Section III is specified or state that any edition or addenda in (a)(1) is acceptable; or the condition should contain the acceptance criteria.

50.55a(g)(6)(ii)(F)(9)

Proposed Change:

The NRC proposes to revise § 50.55a(g)(6)(ii)(F)(9) to address changes in ASME BPV Code Case N-770-2 which allow the deferral of the first inservice examination of uncracked welds mitigated with optimized weld overlays, Inspection Item C-2. Previously, under N-770-1, the initial inservice examination of these welds was not allowed to be deferred. Allowing deferral of the initial inservice examination in accordance with N-770-2 could, in certain circumstances, allow the initial inservice examination to be performed up to 20 years after installation. Therefore, the NRC proposes to adopt a condition which would preclude the deferral of the initial inservice examination of uncracked welds mitigated by optimized weld overlays.

Comment:

The NRC's proposed change seems to be based on licensees obtaining NRC approval to extend their RPV examinations from 10 to 20 years. However, the proposed limitation does not make this clear. As written, the limitation in 50.55a(g)(6)(ii)(F)(9) is read to contradict the provision in 50.55a(g)(6)(ii)(F)(8) because if a licensee has not extended the RPV exams to 20 years, then (F)(8) allows for the examination to be at the end of the interval which is the same duration as the deferral discussed in Note (11)(b)(1) of the Code Case. It may help the reader understand the purpose of the limitation if it is clarified that the limitation applies to plants that have extended their RPV examination interval to something longer than 10 years.

50.55a(g)(6)(ii)(F)(12)

Proposed Change:

The NRC proposes to add 50.55a(g)(6)(ii)(F)(12) to clarify the examination coverage requirements allowed under Appendix I of ASME BPV Code Case N-770-2 for butt welds joining cast stainless steel material. Under current ASME BPV Code, Section XI,

5630 W. Gulf to Lake Highway
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Phone: (352) 563-6020
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Appendix VIII requirements, the volumetric examination of butt welds through cast stainless steel materials is under Supplement 9. Supplement 9 rules are still being developed by the ASME BPV Code. Therefore, it is currently impossible to meet the requirement of Paragraph I.5.1 for butt welds joining cast stainless steel material.

Comment:

The specific content being added in 50.55a(g)(6)(ii)(F)(12) appears to be exactly what is required by -2500(b) of the Code Case. If the NRC requirement is intended to be more than required by the Code Case, additional or revised language is necessary to convey the additional requirements. If the NRC limitation is already addressed in -2500(b), then it is suggested that 50.55a(g)(6)(ii)(F)(12) not be published. Conditions or requirements contained in 50.55a that only reiterate the Code requirement confuse the reader as the reader is trying to interpret what the NRC is conveying because the reader does not expect the NRC to restate what is already in the Code.