

From: [Parry, Robert](#)
To: [RulemakingComments Resource](#)
Cc: [Wolfgang, Robert](#); [Farnan, Michael](#); [John G. Billerbeck \(john.billerbeck@nrc.gov\)](#); [Bedi, Gurjendra](#); [Bradley Scott \(bjscott@stpegs.com\)](#); [cglass1@entergy.com](#); [dbpatel@southernco.com](#); [DSwann1948@gmail.com](#); [Joseph Sabina \(jsabina@entergy.com\)](#); [mark.clouse \(mark.clouse@pgnmail.com\)](#); [Mark Gowin \(magowin@tva.gov\)](#); [Robert D Binz](#); [Robinson, Thomas V.](#); [Ron Lippy \(rcl@tnorthconsulting.com\)](#); [ross.atkinson@xenuclear.com](#); [Shelly Neyhard \(man@tnorthconsulting.com\)](#); [Thomas R Ickes](#)
Subject: [External_Sender] ISTOG Rulemaking Extension Request
Date: Monday, November 30, 2015 4:51:30 PM
Attachments: [ISTOG 2015 11 24 15 Mtg Agenda \(3\).doc](#)
[Signed Copy Rulemaking Extension for ISTOG.pdf](#)
Importance: High

November 30, 2015

**Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001**

Attention: [Rulemakings and Adjudications Staff](#)

Subject: **Comments on Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases, 10 CFR Part 50, RIN 3150-A197**

Reference: 1. Federal Register / Vol. 80, No. 181, pp. 56820-56864 / Friday, September 18, 2015 / Proposed Rules

Attachment: 1. ISTOG Agenda (dated 11/24/15) for the December 7 and 8, 2015 Annual Meeting.

Dear Secretary:

The Inservice Testing Owners Group (ISTOG) requests an extension to the public comment period that is to close 75 days from the date of the publication, or by December 2, 2015. ISTOG would like to request January 29, 2016 as *our* submittal date to allow for consolidation, approval of Owner comments, and then submittal to the NRC. As we are the end user of the ASME OM Code, we would like this opportunity to discuss the proposed changes not only with the NRC but also with ASME. This extension would only pertain to the ISTOG Comments and not considered a general extension of the public comment period for other groups or individuals.

Our yearly meeting is scheduled for December 7 and 8, 2015 and we are planning to devote time to discuss the following topics (See Attachment 1):

- 1.) Scoping;
- 2.) Supplemental Indications; and
- 3.) Power Operated Valve Design Bases Verification.

We also understand that the American Society of Mechanical Engineers (ASME) will be providing detailed comments on the Rulemaking effort. We would like our membership to

have time to review their comments in order to finalize the impact on Owner Inservice Testing Programs.

Our meeting is an open session and we understand that some NRC and ASME representatives will be in attendance. They are welcome at our meeting and all attendees will be given opportunity to discuss these pertinent issues with our membership. Our membership may have specific questions for both the NRC and ASME representatives.

If you have any questions in regards to the contents of this letter, please direct them to Mr. Robert Parry, ISTOG Chair at (603) 773-7550 or by e-mail (Robert_Parry@fpl.com).

Very Truly Yours,

Robert Parry
ISTOG Chair
on behalf of the ISTOG

cc: Members, ISTOG Steering Committee
NRC ASME OM Code Committee representatives

November 30, 2015

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: **Comments on Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases, 10 CFR Part 50, RIN 3150-AI97**

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Very Truly Yours,

A handwritten signature in black ink, appearing to read 'R Parry', with a long horizontal flourish extending to the right.

Robert Parry
ISTOG Chair
on behalf of the ISTOG

cc: Members, ISTOG Steering Committee
NRC ASME OM Code Committee representatives

PROGRAMMATIC STRATEGY
Monday, December 7, 2015

| TIME | ITEM | FACILITATOR |
|-------------|--|---|
| 0700 - 0800 | Breakfast | ALL |
| 0800 - 0820 | Opening Remarks Steering Committee introductions Financial Status- geared to establishing deliverables and 2015 Fees. | Bob Parry, Seabrook Station Tom Ickes, Treasurer |
| 0820 - 0900 | Standardized IST Program Health Reports Group Discussion | Steve Mays, Fleet IST Program Lead, Duke Energy Corporation |
| 0900 - 0915 | BREAK | |
| 0915- 1000 | NRC Liaison Report | Bob Wolfgang, NRC |
| 1000 - 1015 | BREAK | |
| 1015 - 1145 | OM Code Summary Part 1 | Ron Lippy, TNC |
| 1200 - 1300 | LUNCH | ALL |
| 1300 - 1500 | OM Code Summary Part 2 | Ron Lippy, TNC |
| 1500 - 1515 | BREAK | |
| 1515 - 1545 | Self-Assessments – Palo Verde, Prairie Island Comments from each Host and the PEERs as applicable. Emphasis should be on what was done well and what can be improved on, and what the PEER insights were. Other Owners willing to share insights Focus of 2016 One Owner Request – Automated trending of IST Components Bradley Fox, Palo Verde | Bob Parry, Seabrook Station |
| 1545 - 1645 | 10CFR50.55a Rulemaking – Scope issues <ul style="list-style-type: none"> • Class 1, 2, and 3 deletion? • Which accidents ? • Spent fuel • DG FOT • FLEX • Augmented Programs – Flooding • Skid Mounted | Steering Committee |
| 1645 - 1700 | BREAK | |
| 1700 - 1745 | Closed Session - Owners Only - Topics for Owner takeaways, carryover items for the Tuesday open session, and desired deliverables for ISTOG. Two Owner requests | Bob Parry & Steering Committee |

PROGRAMMATIC STRATEGY
Tuesday, December 8, 2015

| TIME | ITEM | FACILITATOR |
|--------------------|--|--|
| 0700 - 0800 | Breakfast | ALL |
| 0800 - 0815 | Logistics - Any adjustments to the Agenda | Bob Parry |
| 0815 - 0900 | Snubbers – Implementation issues | Glen Palmer, ISTD Chair and Consultant |
| 0900 - 0915 | BREAK | |
| 0915- 1000 | Snubbers – NRC Assessment | G. Bedi |
| 1000 - 1015 | BREAK | |
| 1015 - 1100 | ASME OM Code Comparison Deliverable | J. Neyhard |
| 1100 - 1145 | Supplemental Indications Follow-up | Gregg Joss |
| 1145 - 1245 | LUNCH | |
| 1245 - 1330 | 10CFR50.55a Rulemaking - Supplemental Indications <ul style="list-style-type: none"> • Potential Impact to outage scope for bi-directional testing. • Costs in procedures, scheduling, traditional vs non-traditional implementation. • Change to intervals as credit for exercising is achieved when both directions are achieved. | Steering Committee |
| 1330 - 1345 | BREAK | |
| 1345 - 1500 | NRC Q &A – Power Operated Valves – New Plants only? <ul style="list-style-type: none"> • New Plant Power-Operated Valves – “Licensees shall periodically verify the capability of power-operated valves to perform their design-bases safety functions” which exists for Generic Letter 89-10/96-05 MOVs, and JOG Category 1 AOVs and is being extended to other power-operated valves. • Other issues | Bob Parry/Bob Wolfgang |
| 1500 - 1515 | BREAK | |
| 1530- 1600 | Closing Comments - Plus/Delta | Bob Parry, Seabrook |
| 1600 - 1630 | Closed Session – Steering Committee Focus on 2016 | Steering Committee |