

# 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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## Submitter Information

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## General Comment

1) The proposed change to 50.55a(f)(4) would remove reference to ASME Code Class 1, 2, and 3 components from 50.55a:

Old:

"Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are classified as ASME Code Class 1, Class 2, and Class 3 must meet the inservice test requirements (except design and access provisions) set forth in the ASME OM Code.... "

Proposed:

"Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are within the scope of the ASME OM Code must meet the inservice test requirements (except design and access provisions) set forth in the ASME OM Code..."

The ASME OM Code does not specify ASME Code Class 1, 2, or 3, because 10CFR50.55a already did. Since the ASME OM Code itself does not specify ASME Code Class 1, 2, or 3 components, this proposed change would effectively expand the scope of the IST Program (AMSE OM Code ISTA-1100) from ASME CC 1, 2, or 3 pumps and valves which perform specific functions to achieve safe shutdown, maintain safe shutdown, or mitigate the consequences of an accident to ALL pumps and valves which perform these 3 functions.

This would require extensive effort by the Licensees to ensure all plant equipment is properly scoped and tested by the IST program as needed. Some of this equipment may include FLEX equipment, Spent Fuel Pool Cooling Pumps, etc. These SSCs were never meant to meet the strict testing requirements of the OM Code. Nor were the requirements contained in the OM Code meant for non-Code SSCs. The Relief Valve and Snubber programs would also be affected.

2) The Inservice Testing Owner's Group (ISTOG) also has some concern about implementation requirements/costs for 50.55a(b)(3)(xi) (new), which deals with new requirements for position indication verification following the Browns Ferry MOV Finding:

"OM condition: Valve Position Indication. When implementing ASME OM Code, Subsection ISTC-3700, "Position Verification Testing," licensees shall develop and implement a method to verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation, to provide assurance of proper obturator position. "

This will also require extensive effort by the Licensee to ensure that RPI/PIV testing of existing IST valves meets this new requirement. Any new IST SSCs that are added to the Program per the change to 50.55a(f)(4) will also need to meet this requirement. This may result in installation of new test connections or new STPs.

3) In 50.55a(b)(3)(iii), OM Condition: New Reactors, Section D "High risk non-safety systems. Licensees shall assess the operational readiness of pumps, valves, and dynamic restraints within the scope of the Regulatory Treatment of Non-Safety Systems for applicable reactor designs."

This is tied to the proposed change to 50.55a(f)(4): it is the IST Engineer's opinion that, while the ASME OM Code can be used (at the Licensee's discretion, on an augmented testing basis) to test non-ASME-Code Class or Non Nuclear Safety Related components, it should not be a requirement to use it to test these components.

The IST Owner's group intends to discuss the proposed rule change at the Dec 2015 meeting and request an extension to January 29, 2016 on the comments deadline to facilitate these discussions, so that comments of the group may be incorporated into the rule making.