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# 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

10 CFR 50.55a(g)(6)(ii)(F)(13) Encoded ultrasonic examination:

Ultrasonic examinations performed in accordance with the requirements of Table 1 for Inspection Item A-1, A-2, B, E, F-2, J, and K shall be performed for essentially 100 percent of the inspection surface area using an encoded method.

Comment No. 1- The proposed condition does not recognize that all configurations will not facilitate encoded examination or credit the effectiveness of mitigation.

The industry has already recognized the need for implementing encoded examinations of PWR welds that are susceptible to stress corrosion cracking (SCC). In 2013, the industry issued the "Guideline for Conducting Ultrasonic Examinations of Dissimilar Metal Welds, Revision 1" that includes an NEI-03-08 "needed" element that requires encoding of examinations based upon SCC susceptibility, whether the item has been mitigated and a pre mitigation or subsequent examination was performed using an encoded technique, and whether encoded equipment exists. The "needed" requirement of the guideline required implementation to support the next refueling outage scheduled after January 1, 2014, during which dissimilar metal welds (DMW) are scheduled for examination.

The condition does not consider configurations that might be limited from obtaining complete coverage with encoded examinations. Because the requirement is prescriptive to encode without any flexibility, licensees will be required to submit an exemption request for examination coverage that is less than essentially 100% obtained by the encoded exam and non-encoded techniques could be applied to obtain the required examination coverage. The lack of flexibility in the proposed condition results in undue burden on licensees for reduced coverage exemption requests.

The "needed" requirement being implemented as a result of issuance of the "Guideline for Conducting Ultrasonic Examinations of Dissimilar Metal Welds, Revision 1" provides a consistent, repeatable decision process for selecting encoded or non-encoded UT technology for the examination of dissimilar metal welds that recognizes all configurations will not facilitate encoded examinations due to configuration and credits mitigation types included in ASME Code Case N-770-2 as effective.

The proposed condition will result in relief request submittals that will burden licensee resources for preparation and submittal and NRC resources for review and approval without a compensating increase in safety.

Suggested Modification: The proposed paragraph (g)(6)(ii)(F)(13) is unnecessary and should not be included in the next revision of 50.55a