

**From:** [Mohseni, Aby](#)  
**To:** [Parry, Robert](#)  
**Cc:** [Kokajko, Lawrence](#); [Bladey, Cindy](#); [Inverso, Tara](#); [Doyle, Daniel](#); [Hoffman, Keith](#); [Gallagher, Carol](#); [RulemakingComments Resource](#); [Bailey, Marissa](#)  
**Subject:** RE: ISTOG Rulemaking Extension Request  
**Date:** Wednesday, December 02, 2015 2:07:58 PM

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Mr. Parry,

We have reviewed your request dated November 30, 2015, to extend the comment period for the "Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases" proposed rule published on September 18, 2015 (80 FR 56820). Please note that the comment period is closing today, December 2, 2015, and we are unable to extend the comment period at this point. In addition, we decline to re-open the comment period because of the importance of maintaining a predictable schedule for this rulemaking and the relationship between this rulemaking and other ongoing rulemakings for 10 CFR 50.55a. However, as noted in the proposed rule, the NRC will consider comments received after the deadline if it is practical to do so, and, as such, we encourage you to submit your comment as soon as it is available.

Sincerely,

Aby Mohseni, Deputy Director

Division of Policy and Rulemaking

Office of Nuclear Reactor Regulations.

**From:** Parry, Robert [mailto:Robert.Parry@nexteraenergy.com]  
**Sent:** Monday, November 30, 2015 4:51 PM  
**To:** RulemakingComments Resource  
**Cc:** Wolfgang, Robert; Farnan, Michael; John G. Bellerbeck (john.bellerbeck@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  
**Importance:** High

November 30, 2015

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

**Attention:** Rulemakings and Adjudications Staff

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**Subject: Comments on Incorporation by Reference of American Society of Mechanical Engineers**

## **Codes and Code Cases, 10 CFR Part 50, RIN 3150-AI97**

**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](mailto: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