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Comment On: NRC-2011-0088-0003

Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases

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Comment on FR Doc # 2015-23193

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General Comment

B. ASME BPV Code, Section XI.

10 CFR 50.55a(a)(1)(ii) ASME Boiler and Pressure Vessel Code, Section XI. (proposed rulemaking 2015-23193 pdf page 17)

"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"

This implies that all nonmandatory appendices must be referenced now since there are only 3 instances of the word "nonmandatory" and 0 (zero) instances of the word "non-mandatory" in the current 50.55a - these are things such as flaw evaluation, evaluating coverage, fracture toughness criteria, qualification of personnel written practice requirements, surface conditioning, analysis of flaws, forms, etc. These are not things that require prior approval currently, but are not referenced in 50.55a - 50.55a references Section XI as a whole, and calls out exclusions.

10 CFR 50.55a(b)(2)(xviii)(D) NDE personnel certification: Fourth provision. (proposed rulemaking 2015-23193 pdf page 26)

"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."

These are 2 different appendices - Appendix VII is Qualification of NDE personnel - there is no subarticle VII-2200, and Appendix VIII, VIII-2200 requires the use of VIII-3000 which deals with Performance Demonstration. NRC should clarify here since they didn't get it correct.

"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."

NRC should just stick with 2008 if this is the case instead of requiring compliance with a later code year than many plants are committed to. This creates big issues for all plant qualification programs, and there has most likely not been a backfitting analysis performed.

10 CFR 50.55a(b)(2)(xxxi) Section XI condition: Mechanical clamping devices. (pdf page 29)

"The NRC proposes to add 50.55a(b)(2)(xxxi) to prohibit the use of mechanical clamping devices on Class 1 piping and portions of piping systems that form the containment boundary."

There appears to be no sound basis for this conclusion. These devices have been proven time and time again to be quite effective and very near permanent. There is no basis for prohibition of these devices other than a belief or feeling stated here.

10 CFR 50.55a(g)(6)(ii)(F)(1) Implementation (pdf page 63)

"The NRC proposes to revise 50.55a(g)(6)(ii)(F)(1) to change the version of ASME BPV Code Case N-770 from N-770-1 to N-770-2 and to require its implementation (with conditions) to incorporate the updates and improvements contained in N-770-2. The NRC proposes that licensees begin using N-770-2 on the effective date of this rule."

No timeframe to implement means procedures, etc, already have to be in place for something that is not yet in the rule. This is unacceptable as a timeframe - procedures would not be in compliance if released early, and would not be in compliance if released late.

10 CFR 50.55a(g)(6)(ii)(F)(4) Examination coverage (pdf page 64 of "proposed rulemaking 2015-23193)

"The NRC proposes to establish an essentially 100 percent volumetric examination coverage requirement for circumferential flaws to provide reasonable assurance of structural integrity of all ASME Code Class 1 butt welds susceptible to PWSCC."

This needs to state essentially 100 percent of the required volumetric examination coverage for circumferential...

The way NRC states it says the full 100 percent of the weld volume even if that is not what the Code detection requirement is. It should be as all other exams are - essentially 100% of the Code required coverage

volume. NRC should put a limit on the use of the last sentence of -2500(c), and not the entire section. -2500 (d) is understandably restricted.