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To: [RulemakingComments Resource](#)
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Subject: [External_Sender] Comments on PRM Docket ID NRC-2011-0088: 10 CFR Part 50, Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases
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Attachments: [Comments from Southern Nuclear Operating Company re 50-55a.pdf](#)

Ladies and Gentlemen:

Attached please find Southern Nuclear's comments regarding NRC's proposed rulemaking, Docket ID NRC-2011-0088, 10 CFR Part 50, Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases.

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Comments from Southern Nuclear Operating Company

December 15, 2015

Re: Docket ID NRC-2011-0088: 10 CFR Part 50, Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases

Comment One:

50.55a(b)(3)(xi) OM Condition: Valve Position Indication

Draft Rule - 10CFR50.55a

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.

Comments:

The major burden here is the "shall statement" regarding the implementation of supplemental methods to verify obturator position and movement. The ASME Subsection ISTC, is working to change the code to alleviate the regulatory concern associated with the determination of obturator position or movement using ONLY stem position.

The background information for the proposed rule indicates that this is only a "clarification of the intent of the existing ASME OM Code". This statement is misleading and incorrect. The existing code does not require supplemental indications to be performed with all position indication testing. This was confirmed through ASME OM Code Interpretation 12-01, which is consistent with how the industry approaches this testing. This NRC "clarification" of the code would result in a very significant new requirement for licensees. Finally, based on the NRC's Backfit Rule, this "clarification" appears to be a new or different regulatory position that would require a backfit analysis.

To impose this condition on every IST component with a position indication test would be overly burdensome to the licensees with little to no benefit in return. For example, the 3 TVA plants have approximately 3,000 power operated valves that will need to be evaluated for available supplemental indication methods. Considering that both open and closed positions must be verified, this translates to approximately 6, 000 new tests. New or revised procedures will be required for these new tests.

This condition, as written, should be removed from the rulemaking. If this condition remains in the rulemaking, it should add a "where practicable" clause in order to reduce the potential large

volume of requests for relief. In addition, the condition should provide an implementation period to allow licensees adequate time to develop the necessary test procedures.

Comment Two:

50.55a(f)(4) Inservice Testing Standards Requirement for Operating Plants

2015 - 10CFR50.55a

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 and addenda that become effective subsequent to editions and addenda specified in paragraphs (f)(2) and (3) of this section and that are incorporated by reference in paragraph (a)(1)(iv) of this section, to the extent practical within the limitations of design, geometry, and materials of construction of the components.

Draft Rule - 10CFR50.55a

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 and addenda that become effective subsequent to editions and addenda specified in paragraphs (f)(2) and (3) of this section and that are incorporated by reference in paragraph (a)(1)(iv) of this section, to the extent practical within the limitations of design, geometry, and materials of construction of the components.

Comments:

Removal of reference to ASME Code Class 1, Class 2, and Class 3 is a major change and will have significant impact to licensees and NRC. The current industry practice is to limit the IST Program scope to those Class 1, 2 and 3 pumps and valves that fit the scope of OM Code, ISTA-1100. Non-Code Class pumps and valves that perform a safety function (e.g., fit the scope of OM Code ISTA-1100) are typically included in an Augmented IST Program and tested commensurate with their function.

This condition would require relocation of non-Code Class components to the IST Program. As a result, a significant number of plant procedures would have to be revised and any OM Code requirements that can't be implemented as required would require new relief requests to be submitted to NRC for approval. Generally, Augmented IST Programs are designed to meet the OM Code where practicable, but relief requests are not required when alternate testing is required.

For example, the 3 TVA plants have approximately 800-900 pumps and valves currently in scope of the Augmented IST Program that will need to be relocated to the IST Program. Each of

these components will require multiple tests and each of these tests would have to meet the strict compliance of OM Code or require new relief requests. Hundreds of implementation and program procedures will have to be revised.

Recommend leaving the restriction to Code Class 1, Class 2, and Class 3 applicable to existing plants. Then remove the restriction to Code Class pumps and valves for new reactors only.

Comment Three

§50.55a(a)(1)(iii)

Include ASME Code Case N-852, "Application of the ASME NPT Stamp". Alternatively, approve the use of the ASME NPT-Symbol Stamp with the letters "NPT" arranged horizontally.

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