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Subject: [External_Sender] COMMENTS on Docket ID NRC 2011-0088
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Attachments: [Xcel Rulemaking Comments 12-18-15.pdf](#)
Importance: High

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Secretary
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Washington, DC 20555-0001

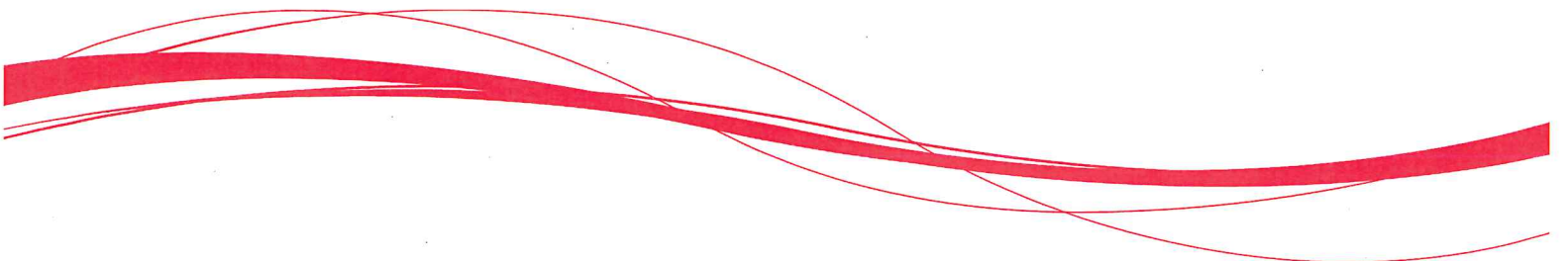
ATTN: Rulemakings and Adjudication Staff

Subject: 10CFR 50.55a Proposed Rulemaking Comments
RIN 3150-AI97 (NRC-2011-0088)

Prairie Island Nuclear Plant (PINGP) appreciates the opportunity to comment on the proposed 10CFR50.55a rulemaking. We have reviewed the proposed rulemaking, issued in draft form on September 18th, 2015. PINGP commends NRC for proactively reviewing newer editions of the code. PINGP's comments on the proposed rule are enclosed for your consideration.

A handwritten signature in blue ink that reads 'Tom Conboy'.

Thomas Conboy
Director, Site Operations
Xcel Energy - Prairie Island Nuclear Plant



Enclosure

§50.55a(b)(3)(iv)

Proposed Changes to Regulations (Draft Rule): (iv) *OM condition: Check valves (Appendix II).* Appendix II, "Check Valve Condition Monitoring Program," of the OM Code, 2003 Addenda through the 2012 Edition, is acceptable for use without conditions with the clarifications that (1) the maximum test interval allowed by Appendix II for individual check valves in a group of two valves or more must be supported by periodic testing of a sample of check valves in the group during the allowed interval and (2) the periodic testing plan must be designed to test each valve of a group at approximate equal intervals not to exceed the maximum requirement interval. Licensees applying Appendix II of the OM Code, 1995 Edition with the 1996 and 1997 Addenda, shall satisfy the requirements of paragraphs (b)(3)(iv)(A) through (C) of this section. Licensees applying Appendix II, 1998 Edition through the 2012 Edition, shall satisfy the requirements of paragraphs (b)(3)(iv)(A), (B), and (D) of this section.

Comment: The condition additions of clarifications (1) and (2) should be removed from rulemaking.

This condition should only be applicable to 1998 Edition through 2003 Addenda. This condition should not be applicable to the 2004 Edition through 2012 Edition because the requirements of (b)(3)(iv)(A), (B), and (D) have already been incorporated into these versions of the code.

§50.55a(b)(3)(xi)

Proposed Changes to Regulations (Draft Rule): (xi) *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.

Comment: 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.

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. Recommend allowing licensees 2 years to implement or the next refueling outage, whichever is longer.

§50.55a(f)(4)

Proposed Changes to Regulations (Draft Rule): (4) *Inservice testing standards requirement for operating plants.* 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.

Comment: 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 the 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. Furthermore, removing reference to ASME Class 1, Class 2, and Class 3 would include components that are not designed to mitigate the consequences of an accident as described in the design basis accident section. Modifications may also be necessary to update to these proposed requirements.

Comments on the Proposed Rules
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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 ASME OM Code requirements that can't be implemented as required would require new relief requests to be submitted to the 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.

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.