



**U.S. NRC**

UNITED STATES NUCLEAR REGULATORY COMMISSION

*Protecting People and the Environment*

**NRC Liaison Report & Updates**  
***Winter SNUG Meeting 2016***  
***Orlando, FL***

Gurjendra S. Bedi, PE

Component Performance, NDE & Testing Branch

Division of Engineering

Office of Nuclear Reactor Regulation

February 1-3, 2016



## Disclaimer

- This presentation was prepared by staff of the U.S. Nuclear Regulatory Commission (NRC). It may present information that does not currently represent an agreed upon NRC staff position. NRC has neither approved nor disapproved the technical content.



## Topic for Discussion

- Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a Rulemaking Updates
- Regulatory Guide (RG) Update – OM Code Case Acceptability
- Snubber Program per 10 CFR 50.55a
- Scope of the Snubber Program
- Generic Communication
- Conclusion



## 10 CFR 50.55a Rulemaking Updates

- Last ASME Code Rulemaking issued on June 21, 2011 (Federal Register, Vol. 76, No. 119, page 36232-36279, dated June 21, 2011).
- Rulemaking incorporates by Reference the 2004 Edition with 2005 and 2006 Addenda of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code , and the 2005 Addenda through 2008a Edition of ASME Boiler and Pressure Vessel (B&PV) Code Section XI.



## 10 CFR 50.55a Rulemaking Updates (cont.)

- The NRC has started the ASME Code rulemaking to incorporate the 2009 Edition through 2012 Edition of the ASME OM Code and the 2009 Addenda through 2013 Edition of ASME Code Section III and XI into 10 CFR 50.55a. This proposed rulemaking was issued for public comments on September 18, 2015 and comment period ended on December 2, 2015, and the final rule is tentatively to be issued in September 2016.



## 10 CFR 50.55a Rulemaking Updates – OM Code Case Applicability

- Final Reg. Guide Rulemaking & Reg. Guides 1.192, Rev. 1 “O&M Code Case Acceptability, ASME OM Code” and RG 1.147, Rev. 17, “Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1” are issued and published in Federal Register in November 2014 (Federal Register, Vol. 76, No. 214, Pages 65776-65814, dated November 5, 2014). Effective date is December 5, 2014.
- Proposed Reg. Guide Rulemaking & Reg. Guides 1.192, Rev. 2 “O&M Code Case Acceptability, ASME OM Code” and RG 1.147, Rev. 18, “Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1” are tentatively scheduled to be published for public comments in February 2016.



## Snubber Program per 10 CFR 50.55a

- 10 CFR 50.55a(g)(4) requires that, throughout the service life of a BWR & PWR nuclear power facility, ASME Code Class 1, 2, and 3 components (including supports) meet the inservice inspection and testing requirements of ASME Section XI or ASME OM Code as incorporated by reference in 10 CFR 50.55a(a)(1).
- 10 CFR 50.55a(g)(4)(ii) requires licensees to revise their inservice inspection programs every 120 months to reflect the latest edition and addenda to Section XI of the ASME B&PV Code incorporated by reference into 10 CFR 50.55a(a)(1)(ii) that is in effect 12 months before the start of the new 120-month ISI interval. This Code edition and addenda is considered to be the “Code of Record” for the inspection interval.



## Snubber Program per 10 CFR 50.55a (cont.)

- 10 CFR 50.55a(g)(4)(iv) notes that ISI of components (including supports) may meet the requirements set forth in subsequent editions and addenda to the “Code of Record” and addenda that are incorporated by reference in 10 CFR 50.55a(a)(1), subject to limitations and modifications listed in 10 CFR 50.55a(b) and subject to Commission approval.
- Licensees have the option of using ASME B&PV Code, Section XI, or ASME OM Code for snubber inservice examination and testing, if their applicable “Code of Record” is 2005 Addendum and earlier Editions and Addenda of Section XI of the ASME B&PV Code as specified in 10 CFR 50.55a(b)(3)(v).





## Snubber Program per 10 CFR 50.55a

- In the current published 10 CFR 50.55a ASME Code rulemaking, the only applicable ASME Code requirements for snubber inservice examination and testing are in the ASME OM Code, because these have been deleted from the 2006 Addenda and later Editions of Section XI.
- In future ISI or IST program updates the ASME OM Code, Subsection ISTD along with the applicable ISTA, will be the only Code requirements governing snubber examination and testing.

## **Snubber Program per 10 CFR 50.55a (cont.)**

- NRC Staff reviewed some of the Snubber Programs and observed the following:
  - Some of the submitted Snubber Programs do not specify “Code of Record.”
  - Some of the submitted Snubber Programs do not specify the start and end dates of the applicable 10-year interval.
  - Some of submitted snubber programs should have specify that if snubber program is developed as part of 10-year ISI or IST interval.
  - Some of the submitted 10-year ISI or IST interval programs state that snubber program is not part of submitted 10-year ISI or IST interval program, without providing details of snubber program.



## Scope of the Snubber Program

- Licensees have the responsibility to demonstrate the continued operability of all snubbers within the scope of their snubber inservice examination and testing program.
- NRC will provide “Scope of the Snubber Program,” under a separate presentation.



## Generic Communication

- NRC issued Information Notice (IN) 2015-09 related to mechanical dynamic restraints (snubbers) lubricant (grease) degradation not identified due to insufficient service life monitoring.

## Conclusions

- Licensees who believe that some of the items discussed are applicable to their facilities may wish to review their current snubber program and modify their program as appropriate.



# Questions?

[Gurjendra.Bedi@nrc.gov](mailto:Gurjendra.Bedi@nrc.gov)

Phone: 301-415-1393