

**From:** [Swain, Ronald](#)  
**To:** [RulemakingComments Resource](#)  
**Cc:** [Latiolais, Carl](#); [Swilley, Steven](#); [Orihuela, Mike](#); [Abbott, John](#); [Weeks, Paul](#); [Nove, Carol](#); [Cumblidge, Stephen](#); [Cinson, Anthony](#); [Spanner, Jack](#); [Dennis, Mark](#)  
**Subject:** [External\_Sender] Comments to 10 CFR Part 50 Incorporation by Reference of American Society of Mechanical Engineers [Docket ID NRC-2011-0088]  
**Date:** Thursday, January 21, 2016 12:23:23 PM  
**Attachments:** [NDE 20160121-001 10CFR50 55a Proposed Rulemaking Comments.pdf](#)

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Dear Sir or Madam,

The attached letter provides a comment to the subject 10CFR50.55a Proposed Rulemaking on behalf of the Nuclear Nondestructive Examination (NDE) Program at the Electric Power Research Institute.

If you have any questions or need clarification on any part of the attached letter, please feel free to contact me (contact information provided below).

Best Regards,

**Ronnie Swain**  
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**Nondestructive Evaluation (NDE)** \_\_\_\_\_ **20160121-001**

January 21, 2016

Via Email

Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20055-001  
ATTN: Rulemakings and Adjudications Staff

**Subject: 10CFR50.55a Proposed Rulemaking Comments  
RIN 3150-AI97 (Docket ID NRC-2011-0088)**

Dear Sir or Madam,

This letter provides a comment to the subject proposed rulemaking on behalf of the Nuclear Nondestructive Examination (NDE) Program at the Electric Power Research Institute.

**EPRI NDE Comment** - Paragraph (b)(2)(xv)(L) *Specimen set and qualification: Twelfth provision* states, "As a condition to the requirements of Supplement 8, Subparagraph 1.1(c), to Appendix VIII, notches may be located within one diameter of each end of the bolt or stud."

According to ASME Section XI, FIG. IWB-2500-12, the examination volume for closure studs starts at the top of the edge of the nut, in the bolted position. This means that the end of the bolt or stud has no standard relationship to the location of the start of the ultrasonic examination volume and, often, the examination volume does not start within one diameter of the end of the bolt or stud.

Placing a calibration notch outside of the examination volume defeats the purpose of establishing examination sensitivity, since the area that the examination sensitivity matters most is within the required examination volume. In fact, calibrating on a notch significantly outside of the examination volume could lead to an inadequate examination sensitivity being used, which could lead to degraded examination performance such as failure to identify service-induced defects.

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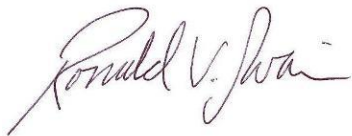
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*Suggested Modification:* To resolve the issue described above, we suggest that paragraph (b)(2)(xv)(L) *Specimen set and qualification: Twelfth provision* be changed to read, "As a condition to the requirements of Supplement 8, Subparagraph 1.1(c), to Appendix VIII, notches must be located within the examination volume and within one diameter of each end of that volume.

We appreciate the opportunity to provide comments to this proposed rulemaking. Should you have any questions pertaining to the comment provided in this letter, please contact Ronnie Swain for clarification.

Sincerely,



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