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RULES AND DIRECTIVES
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Submitter Information

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12/24/2015
SDFR 80401

General Comment

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Docket ID NRC-2015-0285 - RIS on Containment Shell or Liner Moisture Barrier Inspection
Under Summary of Issue and Backfit Analysis Paragraphs:

1) While the intent of the RIS wording is so that the code is not too narrowly applied, the RIS language is too broad in scope. Specifically, the following statement could be construed to provide a definition of a moisture barrier significantly outside the intended code definition:

"If a material prevents moisture from contacting inaccessible areas of the containment shell or liner, especially if the material is used as a basis for not performing augmented examinations of a susceptible location per IWE-1241, the material shall be inspected as a moisture barrier."

Taken to an extreme, the words could include the concrete floor within containment, caulking on the roof of an auxiliary building or fuel handling building connecting to containment, and process piping materials. It was never the intent of the code to go to those extremes. The following wording would provide clearer direction that would be less likely to be taken to either extreme (too narrow or too broad) application of the code:

"At a minimum, if a material is intended to prevent moisture from contacting inaccessible areas of the containment shell or liner, and is used as a basis for not performing augmented examinations of a susceptible location per IWE-1241, the material shall be inspected as a moisture barrier. Other locations required to be inspected under ASME IWE, Item E1.30 shall also be examined as moisture barriers."

This clarification, or similar wording, would enhance the RIS and reduce the potential for the code to be too

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add = B. Lehman (bch)

narrowly or broadly applied.

2) Unless the paragraph referred to in item 1 is clarified providing a more limited scope, the paragraph on backfit analysis appears to be factually inaccurate. There is no indication that the NRC interpreted moisture barriers significantly more broadly than the remainder of the ASME consensus body during the original adoption of IWE into 10CFR50.55a or the subsequent rulemakings associated with 10CFR50.55a. While numerous limitations and conditions have been placed on the use of IWE within 10CFR50.55a, an expanded definition of moisture barrier was never one of the conditions imposed. Without the clarification requested in item 1 above, the RIS appears to represent a new NRC position compared to those provided in previous rulemaking and consequently should be considered to be a backfit.