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Containment Shell or Liner Moisture Barrier Inspection

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Containment Shell or Liner Moisture Barrier Inspection

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General Comment

Reference: USNRC Draft Regulatory Issue Summary (RIS) NRC-2015-0285 dated 12.24.15 - Containment Shell or Liner Moisture Barrier Inspection

It should be noted that the following comments are solely mine as an individual and are not representative of any other individual, group, or organization, although they were formulated based on a discussion of this RIS document among several fellow members of the Working Group on Containment earlier this month. As such, any recommendation made in the following comments are based on my personal opinion only and are not to be construed as an official position of any other individual, group, or organization.

Review of the RIS indicates that the NRC staff is concerned about improper (or the lack of) examinations of containment shell or liner moisture barriers as required by Section XI of the ASME Code, Subsection IWE. Instances have been identified of inadequate design classification of certain plant-specific configurations as 'moisture barriers,' with such configurations thereby not having been periodically examined for continued integrity in preventing the intrusion of moisture into inaccessible areas of containment shells or liners. Other instances of classification of materials/configurations as 'non-ASME-Code-boundary' that should have been considered moisture barriers have also precluded the performance of required examinations.

It is understood that inconsistency currently exists in the industry concerning what constitutes a containment

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shell or liner moisture barrier. ASME Code Section XI, Table IWE-2500-1, Note 4 for Item E1.30, Moisture Barriers, identifies containment moisture barrier materials as including ". . . caulking, flashing, and other sealants used for this application." However, there is only one depiction of a moisture barrier in Section XI (Figure IWE-2500-1), so obviously it does not identify every possible moisture-barrier configuration. Additional work on these portions of the Code may be beneficial to the industry for this situation, so recommendation for consideration of such action will be made to appropriate Code Committee personnel.

RECOMMENDATION

Review of specific wording in the Draft RIS Summary (3rd sentence) and RIS Supplementary Information Part II, Background (2nd paragraph, first portion of 3rd sentence), results in the following recommendation.

Existing RIS wording in both locations:

"If a material prevents moisture from contacting inaccessible areas of the containment shell or liner, especially if the material is being relied upon in lieu of augmented examinations of a susceptible location (per IWE-1241), the material must (shall) be inspected as a moisture barrier."

Proposed RIS wording for both locations:

"At a minimum, if a material is intended to prevent moisture from contacting inaccessible areas of the containment shell or liner and is being relied upon in lieu of performing augmented examinations of a susceptible location per IWE-1241, the material shall be examined as a moisture barrier."

I believe that such (or similar) revised wording would eliminate any confusion on the part of an Owner as to the Commission's position on the minimum requirements for moisture barrier examination, as long as an Owner has properly classified such materials in the first place. Removal of the word 'especially' would also contribute to the clarity of the Commission's position.

Thank you for the opportunity to comment.