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Submitter Information

Name: Paul Donavin

Address:

5914 Shanghai Rd

Eau Claire, MI, 49111

Email: paul_donavin@yahoo.com

General Comment

I have two comments:

1. The ASME Code is updated every year. Preparations are underway to publish 2017 edition. NRC is working on 2010 Edition. It appears that NRC is not in compliance with National Technology Transfer and Advancement Act of 1995 (NTTAA) by passive non compliance. Since NRC has many participants in the Code process, they should be prepared to act as soon as final standards votes are counted.
2. The Commission recently rejected the staff's proposal on an IEEE standard because of staff's many conditions. I would suggest the Commission apply the same reasoning to this rule making. Many of the conditions are historical and are the result of a single reviewer's opinion. An example is the rules for the 1994 edition where I watched an NRC reviewer living in Washington, DC telling a PhD from Tokyo, Japan that his seismic analysis defending the edition was non conservative. If there are legitimate questions, these should be separated from the "not sufficiently conservative" or "insufficient information" justifications. Again, the Commission has set a precedent in CVR for SECY-15-0106. ASME has endeavored to address conditions with docketed letters and Code actions.