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Submitter Information

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General Comment

12/23/2015

See attached file(s)

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Attachments

Comments

13

SUNSI Review Complete
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Add= *B. Brady (b1b1)*

S. Bloom (b1b1)

Comments:

1. In XI.S1, S3, S6, and S7, replace referenced "Specification for Structural Joints Using High Strength Bolts," 2009 edition of the Research Council on Structural Connections (RCSC), with "Specification for Structural Joints Using High Strength Bolts," 2014 edition (with April 2015 Errata). The technical basis for the proposed change is related to coating of bolts. The new edition of the RCSC deletes coating ASTM F1136, "Standard Specification for Zinc/Aluminum Corrosion Protective Coatings for Fasteners," on ASTM F1852 from Table 2.1, because such coating has not been approved by ASTM for use on TC bolts. The same guidance is also discussed by RCSC in the preface of the 2014 edition of the specifications for ASTM F2280 bolts.
2. In XI.S6 and S7, there is a lack of sampling regarding detection of aging effects for Non-ASME structural supports. It is proposed in Program Element 4 "Detection of Aging Effects," RG 1.199, "Anchoring Components and Structural Supports in Concrete," is referenced for evaluation and quality assurance guidance for anchorage of components and structural supports on concrete structures, based on sampling. Suggested verbiage shown below in italics is recommended for Program Element 4, "Detection of Aging Effects," to be inserted on page XI.S6-3 of DRAFT NUREG 2191, Volume 2, line 17:

17 includes provisions for more frequent inspections based on an evaluation of the 18 observed degradation. *"Sampled evaluation of anchor bolts (e.g., tightness of anchor bolts, spalling and cracking around anchor bolts) and for gaps between equipment base and concrete surface should follow the guidance of RG 1.199, "Anchoring Components and Structural Supports in Concrete" and applicable industry standards. The representative sample should address specific anchorage (e.g. anchor bolt types) exposed to specific environments. Detection of aging effects to be extended to the rest of the sampled pipe supports."* The responsible

Add reference:

Nuclear Regulatory Commission, Regulatory Guide 1.199, "Anchoring Components and Structural Supports in Concrete," Washington, DC, U.S. Nuclear Regulatory Commission: 2003.