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ASME Code Case N-780

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ASME Code N-780

- N-780 allows an essential variables, typically equipment, to be changed in an Appendix VIII-qualified procedure
- The goal of N-780 is to provide flexibility in upgrading equipment
- The NRC has concerns that untested equipment could be used in inspections, reducing the effectiveness of Appendix VIII requirements

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Proposed RG 1.193 Revision 5

- At this time, the NRC will review application of Code Case N-780 on a case-by-case basis. The Code Case is a new alternative to the current requirements in Section XI, Appendix VIII. The technical justification for the alternative is based largely on the expertise of nondestructive examination experts and laboratory testing. While the laboratory testing was well conducted, it was not bounding. The NRC believes that industry experience in applying the alternative is needed to ensure generic applicability and demonstrate reliability before the alternative can be approved in RG 1.147.

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N-780 and Appendix VIII

- Appendix VIII Paragraph 3130 “Essential Variable Ranges” requires a blind personnel demonstration test to alter an essential variable
- Appendix VIII-4000 provides tolerances in some essential variables
- Supplement 1 provides rules for evaluating the electronic characteristics of ultrasonic systems
- N-780 requires a technical justification and a practical demonstration, with the PDA evaluating both

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Path Forward for N-780

- The NRC is not opposed to the concept, but we have concerns about how N-780 could be applied
- Examples of the N-780 process would be very useful in demonstrating how the code case would be used to update equipment
- The NRC would take any additional technical justification for N-780 into account in the next round of rulemaking for RG 1.147 and RG 1.193