

# PUBLIC SUBMISSION

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Clarification of the Requirements for Reactor Pressure Vessel Upper Head Bare Metal Visual Examinations

**Comment On:** NRC-2018-0038-0001

Clarification of the Requirements for Reactor Pressure Vessel Upper Head Bare Metal Visual Examinations;  
Draft Regulatory Issue

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## Submitter Information

**Name:** Paul Donavin

**Address:**

5914 Shanghai Rd

Eau Claire, MI, 49111

**Email:** pauldonavin@asme.org

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## General Comment

The consensus of the TGHSNA is that the RIS 2018-38 does not reflect the scope of ASME Code Case N-729-4 with respect boric acid deposits found during general visual examinations performed such as part of the boric acid program. Leakage from sources other than the scope of the Case should be resolved by the corrective action program. The Code Case words direct the user to determine to source of leakage and remove extraneous boric acid. The RIS 2018-38 restricts cleaning until the source of the leakage has been confirmed not to be from the head penetrations. Boric acid deposits from other sources are not considered relevant indications under the scope of N-729-4.

**SUNSI Review Complete**

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**ADD= Tanya Mensah**

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