

# 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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## General Comment

See attached file(s)

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## Attachments

NRC-2018-0038 - Draft RIS (CDH comments)

**SUNSI Review Complete**

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**ADD= Tanya Mensah**

**COMMENT #3**

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**Clarification of the Requirements for Reactor Pressure Vessel Upper Head Bare Metal Visual Examinations  
Draft Regulatory Information Summary (RIS) comments – Craig Harrington**

**Draft RIS, Page 2, Summary of Issue, Para. 1:**

This paragraph of the draft RIS references relevant sections in the ASME Code Case under 3141 and 3142.

Code Case Section 3140 broadly addresses Inservice Visual Examinations (VE) and Section 3142 provides Acceptance criteria for Visual Examination findings. Three acceptance approaches are identified:

- 3142.1 - Acceptance by VE
- 3142.2 - Acceptance by Supplemental Examination
- 3142.3 - Acceptance by Corrective Measures or Repair/Replacement Activity

However, the subject paragraph of the draft RIS only addresses acceptance under 3142.2 and 3142.3. Excluding discussion of acceptance by visual examination from this paragraph seems to imply a Code Case interpretation that a “relevant condition” cannot be dispositioned as “not indicative of nozzle leakage” under 3142.1, without resorting to non-visual supplemental examinations.

**Recommendation:** Revise the draft RIS to acknowledge all three acceptance methods for dispositioning “relevant conditions” which are addressed within the Code Case.

**Draft RIS, Page 2, Summary of Issue, Para. 2:**

Code Case Section 3140 generally addresses Inservice Visual Examinations and 3141(c) defines “relevant conditions” that require further evaluation. The determination whether a “relevant condition” is or is not “indicative of nozzle leakage” is made in accordance with guidance in 3142.1(b). This section invokes 3142.3 regarding correcting the source of any leakage, requires cleaning to allow adequate examination and evaluation of degradation, and invokes 3142.2 Supplemental Exams IF the VE indicates the relevant condition is “indicative of possible nozzle leakage”.

However, in the draft RIS, the first sentence of the subject paragraph appears to directly conclude that any areas meeting the 3141(c) definition of a “relevant condition” are “relevant conditions of possible nozzle leakage” with reference to 3142.1(b). As described above, 3142.1(b) prescribes an evaluation process, it does not specify or imply the conclusion that all “relevant conditions” are “relevant conditions of possible nozzle leakage”. This portion of the draft RIS appears to overstate and very conservatively interpret the referenced portion of the Code Case.

**Recommendation:** Revise the draft RIS to clearly acknowledge that “relevant conditions” must be evaluated in accordance with the guidance in Section 3142.1(b) to determine whether the condition is or is not “indicative of possible nozzle leakage.”