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General Comment

Southern Nuclear comment letter signed Justin Wheat (NL-18-1376)

Attachments

NL-18-1376

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Secretary
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ATTN: Rulemakings and Adjudications Staff

NL-18-1376

Southern Nuclear Operating Company Comments on the Proposed Rule and Associated Draft Regulatory Guides (DG–1345, DG–1342, and DG–1343), Docket ID NRC-2017-0024.

Ladies and Gentlemen:

In response to Federal Register Notice 83 FR 40685 released on August 16, 2018, Southern Nuclear Operating Company (SNC) is hereby providing the following comment on the proposed rule and associated draft regulatory guides for the "Approval of American Society of Mechanical Engineers' Code Cases" (Docket ID NRC-2017-0024).

Specific to draft regulatory guide DG-1342, which is revision 19 to RG 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," and code case N-702, "Alternative for BWR Nozzle IRS," the NRC proposes the inclusion of a condition that would prohibit the use of this code case for the period of extended operation (i.e., license renewal period). This condition is in direct contradiction to the background information included in the federal register notice for the proposed rule, which states

> "Licensees that wish to use Code Case N-702 in the period of extended operation may submit relief request based on BWRVIP-241, Appendix A...."

SNC recommends that the staff modify the condition in DG-1342 to state that

> "For the period of extended operation, the applicability of N-702 must be demonstrated by satisfying the criteria of BEWRVIP-241...."

rather than

> "The use of Code Case N-702 in the period of extended operation is prohibited."

This letter contains no NRC commitments. If you have any questions, please contact me at 205.992.5998.

Respectfully submitted,

Justin T. Wheat
Fleet Licensing Manager

JTW/kmo/scm

cc: Southern Nuclear Operating Company
Mr. M. D. Meier, Vice President – Regulatory Affairs
SNC Document Services – RType: CGA02.001