

83FR56156
PR-50

2

PUBLIC SUBMISSION

As of: 12/10/18 7:56 AM
Received: December 07, 2018
Status: Pending_Post
Tracking No. 1k2-96z7-8cox
Comments Due: January 23, 2019
Submission Type: API

Docket: NRC-2016-0082

American Society of Mechanical Engineers 2015 - 2017 Code Editions Incorporation by Reference

Comment On: NRC-2016-0082-0003

American Society of Mechanical Engineers 2015-2017 Code Editions Incorporation by Reference

Document: NRC-2016-0082-DRAFT-0005

Comment on FR Doc # 2018-24076

Submitter Information

Name: Ron Clow

Address:

1717 Wakonade Drive East
Welch, MN, 55089

Email: ronald.clow@xenuclear.com

General Comment

Ref. NRC-2016-0082, 10 CFR Part 50, Proposed Rule

Subject: Comment in difference to the proposed rule.

In differences to the 10 CFR 50.55a(b)(2)(xxvi) Section XI condition: Pressure testing Class 1, 2 and 3 mechanical joints, the following comment is being submitted.

This condition takes exception to ASME Section in XI in that it mandates that a VT-2 pressure test be performed following performance of a repair/replacement activity when the mechanical connection of an item is disassembled and subsequently reassembled.

Moreover, as worded, this condition would require a VT-2 pressure test, if only fasteners, even just one, regardless of the reason the fastener is replaced when the item is disassembled. The ASME III and XI committees have determined that there is no need to perform a pressure test following a repair/replacement activity where the mechanical connection was

disassembled and reassembled as gaskets, bolts, studs, nuts, and washers are specifically exempted from Repair/Replacement and pressure testing.

For installation into a Code Class (1, 2, 3) system, plants use components that are procured as Quality Related in accordance with a QA program and require the items meet material standards, codes, etc. and are subject to additional NDE and testing before being utilized. This gives reasonable assurance that the materials are free of defects and will perform their function during operation.

In the case of valves, pumps, manufactured piping assemblies (ASME III stamped), etc. designed and fabricated to a code or design specification provided by the owner, pressure testing is already required of these items.

Whenever maintenance is performed that requires an item to be disassembled, regardless if it includes an ASME XI repair/replacement activity, a leakage check is performed utilizing plant operators to inspect for leakage during post-maintenance testing / return to service (PMT/RTS) activities. Verifying no leakage is just one of the many observations they perform to assure the item is functioning as expected before considering it operable. Adding a requirement to include a VT-2 examiner and in some cases an ANII, does not increase the level of public safety and it does not meet ALARA in those areas of the plant where radiation is present. Additional personnel are subject to dose unnecessarily with no added safety benefit as the mechanical connection is already being inspected by an operator whose training involves the ability know how the equipment operates and to identify leakage or other abnormal conditions during their normal work duties. Additionally, the mechanical connection is disassembled and reassembled by personnel trained to perform the activity, including use of industry standard bolt torqueing guidance to assure proper integrity of the joint.

While RCS leakage is always a concern and each utility has requirements to address this leakage, this commenter is unaware of any precedence where a mechanical connection has catastrophically failed which would be cause for requiring additional visual scrutiny of the mechanical connection by a VT-2 examiner, including the need for use of an ANII. In cases where a condition of leakage has been identified during PMT/RTS activities (within or outside the ASME Section XI program boundaries), the mechanical connections had no catastrophic failure, and conditions were corrected to eliminate the cause of unacceptable leakage. The leakage can be identified without the need for the added burden of using a VT-2 examiner and an ANII.

As an additional consideration for removal of the condition, plants implementing 10 CFR 50.69 would be implementing an inspection and repair program that is in lieu of ASME XI and 10 CFR 50.55(a). Implementation of 50.69, would require pressure testing per construction code requirements and does not require a VT-2 pressure test following a repair or replacement activity, welded or mechanical. The NRC has found this approach to be acceptable when implementing this alternative regulation and should remain consistent with requirements within 50.55(a).

The NRC should remove this condition and rely on the ASME XI code as written with regards to repair/replacement activities and subsequent pressure testing.