

RulemakingComments Resource

From: Deopere, Richard A. <Richard.Deopere@xenuclear.com>
Sent: Thursday, January 24, 2019 1:10 AM
To: RulemakingComments Resource
Subject: [External_Sender] Comments on Proposed Rulemaking applicable to 10 CFR 50.55a
Attachments: Comments on Proposed Rulemaking - FR - Vol 83 - No 218 - 56156.docx

Dear Sir or Madam,

I respectfully submit the attached comments to proposed rulemaking related to ASME Codes and Standards for 10 CFR 50.55a for your consideration.

Reference Federal Register, Vol. 83, No. 218, pp. 56156-56196, Friday, November 9, 2018, Docket ID NRC-2016-0082.

Respectfully,

Richard Deopere
Brooklyn Park, MN

10 CFR 50.55a paragraph	NRC Proposed Change, Condition, and/or Provision	Reviewer comments
50.55a(b)(2)(xxvi)	<p><i>Section XI condition: Pressure testing Class 1, 2, and 3 mechanical joints.</i> When using the 2001 Edition through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section, licensees shall pressure test mechanical joints in Class 1, 2, and 3 piping and components greater than NPS-1 which are disassembled and reassembled during the performance of a Section XI activity (e.g., repair/replacement activity), in accordance with IWA-5211(a). The pressure test and examiners shall meet the requirements of the licensee's/applicant's current ISI code of record.</p>	<p>I respectfully recommend that the NRC delete the current and proposed condition to (xxvi) as applicable to mechanical joints for the reasons stated below.</p> <p>There is no practical need to impose a requirement to perform a pressure test with a VT-2 examination on a mechanical joint to detect leakage when the equivalent outcome can be fulfilled with a leak inspection by knowledgeable personnel, such as operations, maintenance, instrument and controls, engineering staff, etc., during post-maintenance testing (PMT) and return to service (RTS) activities. Oftentimes, these same knowledgeable personnel are already present at the component location when the system is put into the conditions required for PMT/RTS, so adding a VT-2 examiner, as well as the likelihood of an Inspector from an Authorized Inspection Agency, increases the number of personnel to meet the existing and proposed requirement in order to achieve the same desired outcome.</p> <p>Industry practice during PMT/RTS activities requires that pressure retaining components that have been disassembled and reassembled are checked to verify that no leakage is present at operating conditions, with exception of those connections that are designed for a certain amount of leakage, such as some pump seals, valve packing leakoff connections, etc.; components with those specific exceptions are checked to verify the leakage is at the appropriate level to perform its function as determined by the Owner requirements.</p>

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		<p>ASME Section XI IWA-4540(c), 2002 Addenda of the 2001 Edition and later, requires pressure testing requirements of the Construction Code to be met for a repair/replacement activity. The NRC should not impose the additional requirements stated in this condition for mechanical joints, as they are in excess of the Construction Code requirements.</p> <p>The stated provision to perform a pressure test and VT-2 examination on mechanical joints, which will likely require concurrent witnessing of the examination by an Inspector from an Authorized Inspection Agency, does not provide an increased level of quality or safety, and further imposes undue burden on the licensee to provide the desired outcome to identify leakage or verify no leakage.</p> <p>By imposing an unnecessary requirement to perform pressure testing and VT-2 examination to detect leakage, the stated provision unnecessarily increases the number of involved personnel needed to perform "an examination." This results in an increased risk potential for personnel injury, an increase in required amount of documentation, work preparation, and record keeping; an increase to personnel radiological dose (in opposition to ALARA principles); an increased potential for Code and regulatory non-conformance / non-compliance; and increase to the financial costs associated with implementing the stated provision.</p>