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General Comment

See attached file which contains specific comments by paragraph number

Attachments

NRC-2016-0082 - GOWIN Comments

Docket NRC–2016–0082 - GOWIN Comments - 2108 Draft 10 CFR 50.55a Rulemaking:

Paragraph	Comment
(a)(1)(ii)(C)(54)	Consider not endorsing 2015 Edition of OM Code based on complications related to new Condition that imposes Appendix IV on the 2015 Edition. See comment below for paragraph (b)(3)(xii)
(b)(3)(x)	Recommend deleting this OM Condition. This condition is no longer required because OMN-20 is included RG 1.192, Rev 2
(b)(3)(xi)	Recommend clarifying this OM Condition with respect to its application to Mandatory Appendices. For example, clarify whether the ISTC-3700 methods and frequency OR the Mandatory Appendix methods and frequency are applicable..
(b)(3)(xii)	<p>The 2015 Edition of OM Code does not have the necessary pointers and references to Appendix IV. Therefore, there could be considerable confusion for plants to implement this condition. For example, Appendix IV includes much of the same valve exercise, stroke time, and fail safe test requirements contained in Subsection ISTC, but Appendix IV has combined some of these items and renamed them. Implementers may not recognize that some of these tests are the same.</p> <p>In reality, the only new test requirement in Appendix IV is the Performance Assessment Testing. It may be possible to clarify this new condition to only reference the specific Appendix IV paragraphs related to Performance Assessment Testing such as those listed below.</p> <p>IV-1400(a) IV-1400(b) IV-1400(d) IV-2000 definitions related to Performance Assessment Testing IV-3410 - Performance Assessment Testing IV-3520 Effect of AOV Replacement, Repair, Modification, or Maintenance (portions related to Performance Assessment Testng) IV-3600 - Grouping of AOVs for Performance Assessment Testing IV-3800 - Risk-Informed AOV Inservice Testing IV-5000 - PERFORMANCE ASSESSMENT TEST METHODS IV-6000 - PERFORMANCE ASSESSMENT TEST ANALYSIS AND EVALUATION IV-9100 (b) IV-9100 (c) IV-9100 (f) IV-9100 (g) IV-9100 (h) IV-9200 (c) IV-9200 (d)</p> <p>As an alternative, this rulemaking could be revised to eliminate NRC endorsement of the 2015 Edition of OM Code for use by utilities..</p>
(f)(7)	Recommend clarifying whether this paragraph also applies to Augmented Inservice Testing Programs created to comply with (f)(4) and (f)(6)(ii). It

	<p>may be as simple as stating "AIST Plan and IST Plan".</p> <p>Recommend clarifying that the IST plan submittals required by this paragraph are for "information only", that NRC review and approval is not required, and are not considered NRC commitments that need to be tracked separately from typical compliance with NRC regulation.</p> <p>Recommend adding the 90 day time frame at the end of this paragraph for submittal of interim AIST and IST Plan updates.</p>
(f)(7)(vi)	<p>Please clarify the intent of this this paragraph. <i>"ASME OM Code requirements for components that are not being satisfied by the tests or examinations; and justification for alternative tests or examinations"</i></p> <p>As written, may not be clear to the implementer whether this refers to those Augmented IST program deviations from the OM code that would be Relief Requests if they were in the IST Program or something else entirely.</p>