



DOCKET NUMBER
 PROPOSED RULE PR-Misc. Notice
Reg. Guide

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • (517) 788-0650

October 22, 1979



Secretary of the Commission
 Att: Docketing and Service Section
 US Nuclear Regulatory Commission
 Washington, DC 20555

The following comments concerning Draft Regulatory Guide, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1", are presented for your consideration:

1. Regulatory Position C.1., Code Case 1646 (N-72) - The additional limitation to the Code Case is unnecessary in that it essentially duplicates the conditions and requirements of IWB-3511.1(b), Section XI Division 1.
2. Regulatory Position C.1., Code Case 1647 (N-73) - The additional limitation imposed here requires that any indication be evaluated using all required examinations. This is an overly conservative requirement for ultrasonic examination indications because all indications are not flaws, and all flaws are not of sufficient size to warrant further action. Therefore, it is suggested that this limitation be reworded to allow an appropriately detailed evaluation for each indication, rather than the "do everything possible" approach required. In particular, implementation of the limitation as presently stated may lead to the removal of the core barrel to do inspections which might be judged as unnecessary based on the results of more easily performed and adequate tests.

Although these comments are being submitted beyond the due date, please consider them in future actions concerning this proposed guide.

David P. Hoffman

David P Hoffman
 Assistant Nuclear Licensing Administrator

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