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QUALITY ASSURANCE SYSTEMS
AND ENGINEERING DIVISION

① March 2, 1979

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-50(44FR3719)

Secretary to the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Attention: Docketing and Service Branch

Subject: Comments on Proposed Rules Change

Reference: Proposed Amendment to 10CFR50.55a, Federal Register,
Vol. 44, No. 13 - Thursday, January 18, 1979

Gentlemen:

Southwest Research Institute (SwRI) has reviewed the referenced amendment to 10CFR50.55a which includes revisions to paragraph (b) permitting nuclear power plant owners to utilize the 1977 Edition of ASME Section XI with addenda through the Summer 1978 Addenda with certain modifications. Additionally, the proposed amendment contains revisions of the requirements for periodic upgrading of programs for inservice inspection (ISI) of components and inservice testing (IST) of pumps and valves. Since these proposed rules directly impact ISI and IST programs being planned and/or implemented for utility sponsors at SwRI, we request clarification of the proposed rules in the following areas:

- (1) In the last paragraph of "Supplementary Information", the proposed rules state that "paragraphs...(g)(4)(i) through (g)(4)(iv) are revised...". However, paragraph (g)(4)(v) appears to have been incorporated into the proposed paragraph (g)(4)(iii). Shouldn't the proposed rules be expanded to include deletion of paragraph (g)(4)(v)?
- (2) Paragraph (b)(2)(i) states that the Winter 1975 Addenda, the Summer 1976 Addenda, and the Winter 1976 Addenda of Section XI may not be used "for establishing an inservice inspection program". Does this prohibition also extend to inservice testing programs for pumps and valves?

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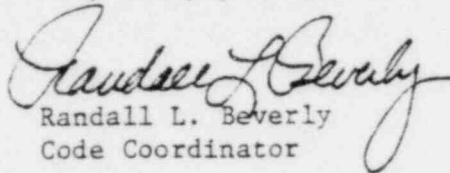
SAN ANTONIO, HOUSTON, TEXAS, AND WASHINGTON, D. C.

- (3) Shouldn't paragraph (b)(2)(ii) include a reference to Category B-F in addition to Category B-J?
- (4) When a nuclear power plant owner elects to "grandfather" his ISI program for his Class 1 piping welds as permitted by paragraph (b)(2)(ii) of the proposed rules, is it permissible to utilize the ultrasonic examination methods specified in Appendix III in the 1977 Edition of Section XI with addenda through the Summer 1978 Addenda [or other Codes subsequently referenced in paragraph (b)] for the examination of such welds?
- (5) The phrase "...shall be examined to the requirements of..." in paragraph (b)(2)(iv)(A) is subject to various interpretations with regard to examination methods, examination volume, etc. For example, "paragraph IWC-1220, Table IWC-2520 Category C-F and C-G, and paragraph IWC-2411 in the Summer 1975 Addenda" as used in paragraph (b)(2)(iv)(A) may be interpreted to be the only requirements of the Summer 1975 Addenda imposed on the ISI program for the Class 2 piping welds of the Residual Heat Removal System, Emergency Core Cooling System, and Containment Heat Removal System. Specifically, is it permissible to utilize Figure IWC-2520-7, Figure IWC-2520-9, and the "Examination Methods" specified in Examination Category C-F of Table IWC-2500-1 as these appear in the 1977 Edition of Section XI with addenda through the Summer 1978 Addenda [or other Codes subsequently referenced in paragraph (b)] to determine the examination methods and examination areas/volumes for the Class 2 piping welds in the three systems cited in paragraph (b)(2)(iv)(A)? Additionally, is it permissible to utilize the ultrasonic examination methods specified in Appendix III in the 1977 Edition of Section XI with addenda through the Summer 1978 Addenda [or other Codes subsequently referenced in paragraph (b)] for the examination of the Class 2 piping welds in the three systems cited in paragraph (b)(2)(iv)(A)?
- (6) When a nuclear power plant owner elects to "grandfather" his ISI program for his Class 2 piping welds as permitted by paragraph (b)(2)(iv)(B) of the proposed rules, is it permissible to utilize Figure IWC-2520-7, Figure IWC-2520-9, and the "Examination Methods" specified in Examination Category C-F of Table IWC-2500-1 as these appear in the 1977 Edition of Section XI with addenda through the Summer 1978 Addenda [or other Codes subsequently referenced in paragraph (b)] to determine the examination methods and examination areas/volumes for the examination of such welds? Additionally, is it permissible to utilize the ultrasonic examination methods specified in Appendix III in the 1977 Edition of Section XI with addenda through the Summer 1978 Addenda [or other Codes subsequently referenced in paragraph (b)] for the examination of such welds?

- (7) The upgrading requirements for ISI and IST programs of nuclear power plants which received their operating license prior to March 1, 1976 is specified in paragraphs (g)(4)(iii) and (g)(4)(ii) of the proposed rules. Plants which receive their operating license on or after March 1, 1976 and begin commercial operation after the effective date of the proposed rules must initiate and upgrade their ISI and IST programs in accordance with paragraph (g)(4)(i) and (g)(4)(ii), respectively, of the proposed rules change. What are the upgrading requirements for plants which receive their operating licenses on or after March 1, 1976 and begin commercial operation prior to the effective date of the proposed rules? Such plants have established (or will establish) an initial 40-month ISI program and an initial 20-month IST program based on the current rules of 10CFR50.55a (g)(4). At the expiration of a 40-month ISI period or a 20-month IST period following the effective date of the currently proposed rules change, should such plants (1) retain and extend their existing ISI or IST programs for the remainder of the first 120-month interval following start of commercial operation or (2) upgrade their ISI or IST programs to the appropriate Section XI Code incorporated by reference in paragraph (b) at that time and retain and extend this upgraded program for the remainder of the first 120-month interval following start of commercial operation?
- (8) Revisions of paragraph (g)(4)(iii) and (g)(4)(iv) were noticed in the Federal Register on November 30, 1978 (Vol. 43, No. 231). These revisions were not incorporated in paragraphs (g)(4)(iii) and (g)(4)(iv) of the currently proposed rules. What is the status of the revisions to paragraphs (g)(4)(iii) and (g)(4)(iv) which were noticed in the Federal Register on November 30, 1978? Additionally, shouldn't similar revisions now be made to paragraphs (g)(3)(iii) and (g)(3)(iv) as were made to paragraphs (g)(4)(iii) and (g)(4)(iv) on November 30, 1978?
- (9) Paragraph (g)(3)(i) specifies that the Section XI Code applied to the preservice inspection of Class 1 components shall, as a minimum, correspond to the vintage of the construction code (i.e., Section III) applied to the various components. For those Class 1 components constructed to the 1974 Edition of ASME Section III with addenda thereto through either the Winter 1975 Addenda, the Summer 1976 Addenda, or the Winter 1976 Addenda, which edition and addenda of the Section XI Code is considered to be in compliance

with paragraph (g)(3)(i) after the proposed rules become effective? For those Class 1 components constructed to the 1977 Edition of ASME Section III with or without the Summer 1977 Addenda and/or the Winter 1977 Addenda, which edition and addenda of the Section XI Code is considered to be in compliance with (g)(3)(i) after the proposed rules become effective.

Very truly yours,


Randall L. Beverly
Code Coordinator

RLB:kp