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

March 21, 1994

Attn: Docketing and Service Branch

59FR979
Proposed Rules for Codes and
Standards for Nuclear Power Plants;
Subsection IWE and Subsection IWL

We are pleased to submit our comments on the subject proposed rules.

We view the Nuclear Regulatory Commission (NRC) activities of providing rules for in-service inspection of Class MC and Class CC pressure retaining components, and their integral attachments, as extremely important. We agree that there is a need for an established regulatory requirement for the periodic examination of containment structures to assure the containment's pressure-retaining and leak-tight capability. We commend the NRC for making in-service inspections of containments a top priority by providing the proposed rules.

We propose that paragraph ix.D.2 be revised to read:

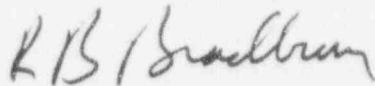
"The absolute difference between the amount removed and the amount replaced ~~may not~~ exceeds 10 percent of the tendon net duct volume." Removal of "may not" and changing "exceed" to "exceeds" changes the paragraph from a stipulated requirement to a condition consistent with paragraph ix.D.

In support of the proposed rules, we endorse the proposed rules for "Codes and Standards for Nuclear Power Plants; Subsection IWE and Subsection IWL."

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We appreciate this opportunity to comment on the subject proposed rules and hope that the above comment will assist you in its finalization. We look forward to working with the NRC to assure the containment structures maintain their pressure-retaining capability.

Very truly yours,



R.B. Bradbury
Chief Engineer
Nuclear Technology & Licensing Division

