



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AC 93-1
Action PDR

AUG 02 1988

MATERIALS
Implementation schedule
to handle IWF

MEMORANDUM FOR: Robert J. Bosnak, Deputy Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Thomas M. Novak, Director
Division of Safety Programs
Office for Analysis and Evaluation
of Operational Data

SUBJECT: INTEROFFICE REVIEW OF PROPOSED RULE FOR 10 CFR 50.55a TO
INCORPORATE BY REFERENCE SUBSECTION IWE OF SECTION XI,
DIVISION 1, OF THE ASME BOILER AND PRESSURE VESSEL CODE

We have reviewed your July 7, 1988 proposal for a rule change in 10 CFR 50.55a to incorporate by reference Subsection IWE (metal containments and metal liners of concrete containments) of Section XI of the ASME Code. We are concerned about the proposed implementation schedule, the length of time before the Code examinations are required, and their relationship to operating plant aging and life extension. We also believe the proposal incorporates Subsection IWF of the Code whether or not it was intended.

The Code allows the IWE examinations (except for seals, gaskets and Appendix J testing) to be delayed until the end of the ten-year inspection interval. Further, the proposed implementation schedule would allow a delay in using IWE for up to two inspection periods or about 6 years and 6 months after June 1, 1990. Thus, this would imply that some plants may not perform examinations for up to 18 years from today (July 1988). This delay includes the 2 years before the regulation takes effect in 1990, plus up to 6 years or two inspection periods for licensees to implement the Code, plus a 10-year delay permitted by the Code to complete examinations. We believe this is an excessive length of time before examinations are required when many plants have already been in operation for more than 15 years.

The potential impact of this delay in examinations can be observed by considering the number of operating plants with respect to the date of issuance of the low power licensee. More than 30 plants with a low power license prior to 1974 could potentially delay examination into the fourth quarter of expected plant life (somewhere between 30 and 40 years). Further, there are approximately 65 plants from 1978 and before. Therefore, initial examinations on more than half of the operating plants may not occur until the third or fourth quarter of expected plant life (20 to 40 years). We understand there may be an effort to not permit examination delays for plants in the fourth quarter of expected life. However, considering the number of plants that could be in operation more than 20 years prior to examination, we believe there should be a strong

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effort to change the Code so it does not permit delay in examinations to the end of an inspection interval. This change should then be invoked immediately by the NRC. These delays could have adverse impacts on efforts to assess both containment aging and decisions about criteria for plant life extension.

The transmittal package indicates the proposed action is to incorporate IWE into Commission Regulations. However, we believe the proposed (g) (4) (iii) incorporates both IWE and the MC component support areas of Subsection IWF of Section XI of the code. The words "For Class MC Components (including supports)" accomplish this. Further, we believe the current (g) (4) incorporates IWF for ASME Code Class 1, Class 2, and Class 3 component supports and the proposed (g) (4) extends this to class MC supports. Thus, the transmittal package should include this fact. We note that in discussions with some RES staff there was doubt about whether 10 CFR 50.55a was intended to incorporate any part of Subsection IWF. However, we believe the regulations as written do incorporate IWF. If this was not intended, this issue should be re-examined.

There is one area in IWE that appears to have omitted a reference pertaining to the examination method. Table IWE-2500-1 identifies the examination method as visual VT-1, VT-2, or VT-3. These visual methods are not defined in IWE, but rather are defined in IWA-2200. Other Subsections of the Code generally identify this fact in paragraph 3130 (such as IWC-3131). However, paragraph IWE-3130 does not include requirements to identify IWA-2200 for the visual examination methods. The Code should correct this omission.

These comments were discussed between Earl Brown of my staff and W. Norris and G. Millman of your staff.



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