



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

~~L. MILLMAN~~  
2. W. NORRIS

August 26, 1988

AC 93-1

PDR

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

FROM: Lawrence C. Shao, Director  
Division of Engineering and Systems Technology  
Office of Nuclear Reactor Regulation

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

The Materials Engineering Branch, Division of Engineering and Systems Technology, has reviewed the Proposed Rule and Draft Regulatory Analysis submitted in your memorandum of July 7, 1988.

The Proposed Rule to incorporate Subsection IWE, "Requirements for Class MC Components of Light-Water Cooled Power Plants" in Section XI of the ASME Code will satisfy in part the requirement of Appendices A and J of 10 CFR 50 and the Standard Technical Specifications for containment inservice examination. We concur that these rules should be incorporated into the regulatory process and do not suggest revision to either the Proposed Rule or the Draft Regulatory Analysis.

Subsection IWE provides the rules and requirements for inservice inspection, repair, and replacement of Class MC pressure retaining components and their integral attachments, and of metallic shell and penetration liners of Class CC pressure retaining components and their integral attachments in light-water cooled power plants. As you know, our concern with Subsection IWE is the provision that permits the deferral of the examination of the welds and bolted connections to the end of the inspection interval. The staff's concern is that blanket deferrals may not be appropriate for aging plants.

We understand that the implementation language of the Proposed Rule is a compromise to permit an elapsed time period of from four to five years. This time period to implement Subsection IWE should permit the staff to resolve our concern with the ASME.

Lawrence C. Shao, Director  
Division of Engineering and Systems  
Technology  
Office of Nuclear Reactor Regulation

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