

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 25, 2020

MEMORANDUM TO: Shaun M. Anderson, Co-Founder

EMBARK Venture Studio

Office of Nuclear Reactor Regulation

FROM: Angela R. Buford, Venture Agent /RA/

EMBARK Venture Studio

Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF FEBRUARY 11, 2020, CATEGORY 2 PUBLIC

MEETING ON the AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) CODE STREAMLINING INITIATIVE

(EPID L-2019-LRO-0074)

On February 11, 2020, the NRC held a Category 2 public meeting to discuss the U.S. Nuclear Regulatory Commission (NRC) staff's idea generation of a variety of ideas to optimize the endorsement of the ASME Code in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a and discuss ideas on streamlining the rulemaking process. This was a working-level meeting intended to be the first of a series of public interactions that will provide the staff industry insights and perspectives that the staff will consider in making decisions on if and how to change the current process.

The public meeting agenda included presentation slides and summaries by the NRC staff and the Nuclear Energy Institute (NEI) (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML20035F219 and ML20031D254, respectively).

Summary of Discussions

This discussion, mostly between NEI and the NRC staff, covered the entire scope of ideas developed by the NRC staff, and these ideas are in the very preliminary stages of being vetted. There are legal, technical, and process implications (in addition to the feedback from external stakeholders) that are still being evaluated by the NRC, and any decision would factor in all of those considerations.

The following ideas were ranked high priority by NEI:

- Change to requirement on updating inservice inspection (ISI) programs
- Documenting NRC-approved votes and code cases for incorporation in rule
- Direct final rule for unconditionally approved code cases
- Revisiting the need to mandate codes and standards by removing Section III, XI and Operation and Maintenance Codes from 10 CFR 50.55a entirely

CONTACT: Angela R. Buford, NRR/EVS

301-415-3166

The following ideas were ranked medium priority by NEI:

- Relocate the text of 10 CFR 50.55a into a regulatory guide (RG) and incorporate the RG(s) into 10 CFR 50.55a
- Add a 10 CFR 50.59-like change control process to allow licensees to make minor deviations from the ASME Code without NRC approval
- Rewrite of 10 CFR 50.55a

The following ideas were ranked low priority by NEI:

- Create a user's guide for 10 CFR 50.55a.
- Performance-based approach to ASME standards

NEI emphasized the following:

- No single idea is a complete streamlining solution and the NRC should consider a combination of ideas
- NEI would like to see reduced or eliminated conditions on ASME standards
- NEI advocates for a quick path to Code Case approval
- NEI is in favor of eliminating the requirement mandating the industry to update to the latest version of the ASME Code

Enclosure: List of Attendees SUBJECT: SUMMARY OF FEBRUARY 11, 2020, CATEGORY 2 PUBLIC MEETING ON

ASME CODE STREAMLINING INITIATIVE (EPID L-2019-LRO-0074) DATED

MARCH 25, 2020

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ABuford, NRR

ADAMS Accession Nos.

MMcCoppin, EDO NRR

Meeting Notice ML20035F219 Meeting Summary ML20091H114 NRC Slides/Handouts ML20035F219 Industry Slides/Handouts ML20031D254

OFFICE	VA:EVS	C:EVS	VA: EVS
NAME	ABuford	SAnderson	ABuford
DATE	3/19/2020	3/25/2020	3/25/2020

LIST OF ATTENDEES

FEBRUARY 11, 2020, PUBLIC MEETING WITH INDUSTRY

PUBLIC MEETING ON ASME CODE STREAMLINING INITIATIVE

Name	Organization	
Thomas Basso	Nuclear Energy Institute (NEI)	
Thomas Loomis	Exelon	
Heather Malikowski	Exelon	
Mark DiRado	Exelon	
Robert Keating	MPR	
Suzanne McKillop	MPR	
Thomas Roberts	POM018 Consult LLC	
Keith Dietrich	TVA	
Matthew Vazquez	ASME	
Paul Fakes	ASME	
Lauren Powers	ASME	
Christian Sanna	ASME	
David Rudland	U.S. Nuclear Regulatory Commission (NRC)	
Michael Benson	NRC	
Angela Buford	NRC	
James O'Driscoll	NRC	
Margaret O'Banion	NRC	
Ronald Lippy	GSE TrueNorth	
Phil Lashley	First Energy Corp	
Damian DeLongchamp	GSE TrueNorth	
Daniel Ryan	Entergy Grand Gulf Nuclear Station	
Bill Fields	Entergy Grand Gulf Nuclear Station	
David T. Jones	Beaver Valley Power Station	
Scott Kulat	Inservice Engineering	
Donna Slivon	Florida Power and Light	
Mark Ferlisi	GSE TrueNorth	
Ronald Gaston	Entergy Nuclear - Echelon	
Mike Lockwood	Hartford Steam Boiler Inspection and Insurance Co	
Steve Richter	Columbia Generating Station	
Kevin Vanspeybroek	Columbia Generating Station	
Chris Smith	Columbia Generating Station	
Brian Larsen	Columbia Generating Station	
Ken Schrecker	Palo Verde Generating Station	
Ralph Hill	ASME	
Nicholas Hansing	NRC	
John Honcharik	NRC	
William Holston	EMC2	
John Schrage	Entergy Services, Inc.	

Bill Doody	PSEG Nuclear	
Audrey Klett	NRC	
Brian Wittick	NRC	
Niklas Floyd	NRC	
Edison Fernandez	NRC	
Christopher T. Brown	Idaho National Laboratory	
Daniel L. Vetter	Idaho National Laboratory	
Ann Marie Stone	NRC	
Kevin Allen	First Energy Nuclear Operations Company	
Carol Nove	NRC	
Steven Slowik	Westinghouse	
Steve McCraken	EPRI	
Mark Weis	Exelon	
Dennis Galvin	NRC	
Robin Dyle	EPRI	
Raj Iyengar	NRC	
Blake Purnell	NRC	
Jason Paige	NRC	
Fred Schofer	NRC	
Robert Roche-Rivera	NRC	
Allen Hiser	NRC	
Kamal Manoly	NRC	
Rob Tregoning	NRC	
Mark Lohrmann	NRC	
Bryce Lehman	NRC	
On Yee	NRC	
Yueh-Li Li	NRC	