

# PUBLIC SUBMISSION

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**Docket:** NRC-2017-0025

Approval of American Society of Mechanical Engineers Code Cases

**Comment On:** NRC-2017-0025-0001

Approval of American Society of Mechanical Engineers' Code Cases; Proposed Rule

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## General Comment

Docket Number:NRC-2017-0025

Comment for Boiler and Pressure Vessel Code Section XI Code Case N-809

(addressed in DG-1367, Table 1)

N-809 2 (2015 Edition) Reference Fatigue Crack Growth Rate Curves for Austenitic Stainless Steels in Pressurized Reactor Water Environments, Section XI, Division 1.

Comment: ASME Section XI Nuclear Code Case N-809 should not be accepted without a condition.

ASME used only mean fit rather than 95% confidence bound for CC N-809 Fatigue crack growth (FCG) rate for austenitic SSs in PWR Environments. The mean fit used in CC N-809 underestimates by a factor of 2 compared to 95% confidence bound. Therefore, FCG in CC N-809 must use 95% confidence upper bound fit of the experimental data.