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Submitter Information

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Organization: Union of Concerned Scientists

General Comment

See attached file(s)

Attachments

ucs comments asme code cases

**Comments of the Union of Concerned Scientists on
the NRC's Proposed Rule on Acceptance of ASME Code Cases,
NRC-2017-0025
April 5, 2021**

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Washington, DC 20006 USA**

The Union of Concerned Scientists opposes the approval of ASME Code Case N-809. The use of a mean fit of test data for fatigue crack growth rate in austenitic stainless steels in light-water reactors is inappropriate and non-conservative, and could underestimate the actual crack growth rate by a factor of two. We believe that the NRC's approval of this Section XI code case could cause unacceptable safety risks by allowing power reactor licensees to conduct important in-service inspections too infrequently to detect the development of significant flaws in safety-related components. As the US reactor fleet gets older, it is critical that aging management programs stay ahead of the "bathtub" curve, rather than fall behind it. Endorsing non-conservative methods for estimating age-related degradation rates will not help achieve that goal.

Instead of approving Code case N-809, the NRC should use a fatigue crack growth rate curve derived from a 95th percentile upper-bound fit of the data, which would be consistent with other guidance, past practice, and international standards.