

CORRECTED Official Transcript of Proceedings

NUCLEAR REGULATORY COMMISSION

Title: Public Meeting on the Proposed Rule to
Incorporate by Reference the 2019 and 2020
Editions of ASME Codes into 10 CFR 50.55a

Docket Number: NRC-2018-0290; RIN 3150-AK22

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NUCLEAR REGULATORY COMMISSION

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PUBLIC MEETING ON THE PROPOSED RULE TO INCORPORATE

BY REFERENCE THE 2019 AND 2020 EDITIONS OF ASME

CODES INTO 10 CFR 50.55a

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THURSDAY

MAY 6, 2021

+ + + + +

The public meeting occurred via
Teleconference, at 1:00 p.m. EST, Victoria Huckabay,
Project Manager, presiding.

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PRESENT

VICTORIA HUCKABAY, Project Manager, Division of
Rulemaking, Environmental, and Financial
Support, Office of Nuclear Material Safety
and Safeguards

CHAKRAPANI BASAVARAJU, Division of Engineering
and External Hazards, Office of Nuclear
Reactor Regulation

SHELDON CLARK, Reactor and Materials Rulemaking
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YAMIR DIAZ-CASTILLO, Division of Reactor
Oversight, Office of Nuclear Reactor
Regulation

KEITH HOFFMAN, Division of New and Renewed
Licenses, Office of Nuclear Reactor
Regulation

KAMAL MANOLY, Senior level Technical Advisor,
U.S. NRC

THOMAS SCARBROUGH, Senior Mechanical Engineer,
U.S. NRC

BOB WOLFGANG, Division of Engineering and
External Hazards, Office of Nuclear
Reactor Regulation

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ALSO PRESENT

TIMOTHY ADAMS, Jensen Hughes

ANGELA BUFORD, U.S. NRC

THOMAS BASSO, NEI

STEPHEN CUMBLIDGE, U.S. NRC

MARK GOWIN, Tennessee Valley Authority

BOB HOKE, Exelon Corporation

CHRISTOPHER KOEHLER, Xcel Energy

THOMAS LOOMIS, Exelon Corporation

KEN LOWERY, Southern Nuclear

GARY PARK, Iddeal

JEFFREY STUMB, Dominion Energy

GLENN WEISS, Exelon Corporation

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P-R-O-C-E-E-D-I-N-G-S

1:02 p.m.

MS. HUCKABAY: Let's go ahead and get started.

Again, thank you for calling in or connecting with us online this afternoon.

My name is Victoria Huckabay. I am a rulemaking project manager in the Division of Rulemaking, Environmental, and Financial Support, Office of Nuclear Material Safety and Safeguards.

It is my role today to help the meeting go smoothly to achieve a common objective. My approach will be to set the ground rules, encourage participation, have an open dialog, and maintain a respectful and professional environment. I will keep the meeting focused on the topic at hand and keep track of the agenda to ensure timeliness and that all topics are covered.

This is a comment-gathering public meeting, which means that it is structured to provide opportunities for public participation. The topic of discussion today is the proposed rule which intends to incorporate by reference the 2019 Edition of the

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American Society of Mechanical Engineers Boiler and Pressure Vessel Code and the 2020 Edition of the Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST.

In the same proposed rule, the NRC also intends to incorporate by reference the 2011 Addenda to ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications, also known as ASME NQA-1b-2011, and the 2012 and 2015 Editions of ASME NQA-1.

The proposed rule was published in the Federal Register on March 26th, 2021. The citation for the proposed rule in The Federal Register 86 FR 16087.

The public comment period is open through May 25th, 2021. The NRC staff would like to receive feedback from meeting participants on specific NRC decisions and actions to ensure that the staff understands your views and concerns and answer questions regarding the rulemaking effort. While the NRC staff will use comments received during this meeting to inform their decision-making, the staff will not be treating comments received during the meeting today as formal comments on the proposed rule.

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The staff encourages members of the public to submit their comments in writing via one of the methods outlined in the Federal Register notice in order to receive formal consideration.

We have provided an agenda which includes time to discuss your questions on the status of the rulemaking. Our meeting is scheduled for one two-hour session with no breaks.

Before we get started, I would like to go over some logistics and housekeeping items.

Please keep your line muted when not speaking in order to minimize the noise during the meeting. If possible, please use the "Raise Your Hand" function in Microsoft Teams to let me know that you would like to ask a question or provide a comment, and I will call your name when it is your turn to speak. Only one speaker at a time, please. Also, please state your name before speaking and organizational affiliation, as this meeting is being recorded and transcribed.

Please hold your questions until the end of each topic of the NRC's presentation, as outlined in the agenda. Please try to be concise to ensure all stakeholders can share their perspective.

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Please use the chat function in Microsoft Teams to let me know if you are having technical difficulties, but please do not type your comments in the chat. I may not be able to monitor the chat frequently enough to read your comments and announce them.

If you choose to speak, please speak slowly and clearly and remember to state your organizational affiliation.

Also, if you are at a computer and are not using Microsoft Teams to access today's meeting, but still would like to see the slides for today's meeting, you can access them on the NRC's home page, www.nrc.gov. Under the Public Meetings & Involvement heading, click on the link to the Public Meeting Schedule. Scroll down to today's date and meeting time. Find the information for this meeting and click on the "more" link.

You'll bring up more details of the meeting. At the bottom of the page, under "Related Documents," you'll find a link to the presentation slides, and you can also see at the top righthand corner the ADAMS Accession No. is shown on the slide. It is ML21116A030.

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Please be careful not to discuss any safeguards, security-related, classified, or proprietary information during this meeting.

Although we intend to have an open dialog, please note that the NRC will not make any regulatory commitments during this meeting.

On the agenda for today's meeting, I will discuss the purpose of the meeting and provide a brief overview of the rulemaking process and the status of the rulemaking to incorporate by reference the ASME Code Editions into the NRC's regulations.

Next, the staff will provide an overview of the changes for the 2019-2020 ASME Code Editions proposed rule for ASME Section III; conditions related to Quality Assurance in ASME Sections III and XI, and the changes for the 2019-2020 ASME Code Editions proposed rule for ASME Section XI and the ASME OM Code.

At the end, we will have an open discussion where members of the public will have an opportunity to ask the NRC staff questions pertaining to the proposed rule or offer their feedback.

The purpose of this meeting is to provide a brief status update on the ongoing rulemaking which

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affects 10 CFR 50.55a, "Codes and standards." The staff will also discuss the major provisions of the proposed changes related to incorporation by reference of the 2019 Edition of the ASME Boiler and Pressure Vessel Code and the 2020 Edition of the ASME OM Code in 10 CFR 50.55a.

Please note that the staff will consider information and perspectives discussed today when developing the proposed rule, but the NRC will not be developing detailed written responses to comments received during this public meeting.

If you would like for your comments to receive formal consideration during the rulemaking process, please submit your comments on the docket in writing using one of the methods for submitting comments described in the Federal Register notice.

And here, on this slide, you can see the two methods for submitting the comments in writing. They are exactly as specified in the Federal Register notice.

You can submit your comments using the federal rulemaking website by going to www.regulations.gov and searching for Docket ID NRC-2018-0290.

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The other method is by emailing your comments to rulemaking.comments@nrc.gov. You should receive an automatic reply when you email your comments. If you do not receive an automatic email reply confirming receipt, then please contact us by phone at 301-415-1677.

The rulemaking we are going to discuss today is the proposed rule to incorporate by reference the 2019 Edition of the ASME Boiler and Pressure Vessel Code and the 2020 Edition of the ASME Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST, for nuclear power plants.

In the same rulemaking, the NRC is also proposing to incorporate by reference the 2011 Addenda to ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications, and the 2012 and 2015 Editions of ASME NQA-1, Quality Assurance Requirements for Nuclear Facility Applications.

The Regulation Identifier No. for this rulemaking is 3150-AK22, and the Docket No. is NRC-2018-0290.

The proposed rule was published in the Federal Register on March 26th, 2021. The citation

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is 86 FR 16087, and a 60-day public comment period is open through May 25th, 2021.

This slide shows our typical rulemaking process. Rulemaking is how the NRC develops its regulations. We begin by identifying the need for rulemaking.

Since the 1970s, it has been the NRC's policy to periodically update the regulations to incorporate by reference new editions of the American Society of Mechanical Engineers Codes. This is intended to maintain the safety of nuclear power plants and to make NRC activities more effective and efficient.

In the second box, the green box here, is the development of the regulatory basis -- in the past, it was referred to as the technical basis -- where our task is to develop the foundation for an effective rulemaking. For ASME rulemakings, the staff does not develop or publish a standalone regulatory basis document. However, the staff provides a discussion of the justifications for the rulemaking, describes the issues that need to be addressed, and provides the scientific, technical, legal, and policy information that supports the

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rulemaking in the Federal Register notice for the proposed rule.

So, we are right now in the third box, in orange, "Proposed Rule". The discussion of how the NRC proposes to incorporate by reference the 2019 and 2020 ASME Code Editions is provided in the Federal Register notice for the proposed rule. The FRN also contains the draft rule text and provides a detailed discussion explaining the proposed action and the basis for the proposed changes.

The Federal Register notice was published on March 26th, 2021, for the 60-day public comment period. All interested members of the public now have an opportunity to participate in the rulemaking process by providing comments during the public comment period.

The written comments we receive during the comment period will go on a docket for the rule. In the final rule, we will include a summary of the stakeholder interactions, comments, and key messages we received from the public on the proposed rule.

This slide shows the timeline for development of the last several ASME Code editions and addenda rulemakings. You can follow the cascading

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waterfall representation that shows how various editions and addenda of the ASME Boiler and Pressure Vessel Code and the OM Code were incorporated in the NRC regulations.

We highlight each rulemaking in a different color for the ease of the viewer. For example, highlighted in purple here is the most recently completed ASME Code editions rulemaking, which incorporated by reference the 2015 and 2017 Editions of the ASME Boiler and Pressure Vessel Code and OM Code. The proposed rule was published on November 9th, 2018, with the FRN citation as shown on this slide, 83 FR 56156. The final rule was published on May 4th, 2020 in Volume 85 of The Federal Register, page 26540. You can also see there is a footnote here that there was a correction that was subsequently published on June 3rd, 2020, and the citation is 85 FR 34087.

For the 2019-2020 Code Editions rulemaking, we published the proposed rule in the Federal Register on March 26th, 2021, and the FRN citation is shown on this slide. And the final rule is scheduled to be published in June 2022.

The scope of the 2019-2020 ASME Code

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Editions rulemaking includes the following:

Incorporation by reference of the 2019 Edition of Section III, Division 1, of the ASME Boiler and Pressure Vessel Code. Within this area, the staff is proposing to add one new condition and revise five existing conditions in 10 CFR 50.55a.

Further, the scope includes incorporation by reference of the 2019 Edition of Section XI, Division 1, of the ASME Boiler and Pressure Vessel Code. Within this area, the staff is proposing to add one new condition and amend seven existing conditions in 10 CFR 50.55a.

The staff is also proposing to incorporate by reference the 2020 Edition of the ASME OM Code. Within this area, the staff is proposing to add one new condition and amend seven existing conditions in 10 CFR 50.55a, and one condition is proposed to be removed.

Finally, the staff is proposing to incorporate by reference the 2011 Addenda to ASME NQA-1-2008, and the 2012 and 2015 Editions of NQA-1. Within this area, the staff is proposing that one condition on the Section III rules and one condition on the Section XI rules be amended.

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Here, on this slide, we bring your attention to the schedule for the 2019-2020 Code Editions rulemaking. The proposed rule was published in the Federal Register on March 26th, 2021. The 60-day public comment period is currently open, and the last day of the public comment period is May 25th, 2021.

The NRC will consider all public comments that will be submitted on the docket during that period. The Federal Register notice provides instructions on how comments can be submitted, which includes submitting comments via the regulations.gov website or emailing comments to rulemaking.comments.nrc.gov.

Following the conclusion of the comment period, the staff will evaluate all comments and make any necessary updates to the rule. The target date for publishing the final rule is by June 30th, 2022.

And now, we are ready for our discussion on the proposed changes for ASME Section III, Conditions Under Consideration. And our next presenter is Dr. Basavaraju.

DR. BASAVARAJU: Okay. Good afternoon.

This is Pani Basavaraju.

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And can we go to the next slide, please?

Yes.

The 2019 Edition of Section III called the analyses for proposing one new condition which relates to the Preservice Inspection of Steam Generator Tubes. It has two provisions.

One is Provision A. When applying the provisions of NB-5283 in the 2019 Edition of Section III, a full-length preservice examination of 100 percent of the steam generator tubing in each newly installed steam generator must be performed prior to plant startup.

Next slide, please.

The second provision of this new condition relates to, when applying the provisions of NB-5360 in the 2019 Edition of Section III, any flaws revealed during preservice examination of steam generator tubing performed in accordance with the Provision A, they must be evaluated within the criteria in the design specifications.

The new condition had two provisions in the Preservice Inspection of Steam Generator Tubes.

Next slide, please.

The NRC is revising existing conditions.

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Four of them relate to Section III and one relates to NQA-1. Basically, the conditions provide to extend their applicability to the latest edition, Section III condition, weld leg dimensions; Section III conditions on seismic design of piping.

Next slide, please.

Section III condition, capacity certification and demonstration of function of incompressible-fluid pressure-relief valves.

And the fourth one is on visual examination of bolts, studs, and nuts.

So, these conditions are revised to extend the applicability to the latest editions of Section III.

Next slide, please.

So, that concludes the Section III conditions.

That's the end of my presentation.

MS. HUCKABAY: Thank you, Pani.

So, I'm going to give it a few moments to see if anyone raises their hand, if anyone would like to ask a question or provide a comment at this time as it relates to proposed changes for Section III. And I see that someone has raised their hand.

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Yes, Timothy Adams.

MR. ADAMS: Yes, my name is Timothy Adams.
I'm with Jensen Hughes.

I just want to make it clear the questions
are my questions. I'm not representing my company or
anyone else.

Can you explain why you're imposing the
conditions on NB, on steam generator tube
inspections?

DR. BASAVARAJU: Okay. I will try to
answer, and if John Honcharik is there, he can give
more details.

This was there, I recall, and got deleted
or eliminated by ASME. So, NRC felt that this
important condition and should be reinstated. That's
why NRC is putting this condition on preservice
inspection of the steam generator tubes.

MR. ADAMS: Okay. So, you feel that it
should not have been deleted and needs to be
maintained, is that correct?

DR. BASAVARAJU: Yes, exactly, that's
correct.

MR. ADAMS: Okay. I anticipate that I
will provide a comment on this formally.

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DR. BASAVARAJU: Okay. Definitely, and we'll consider it. Thank you.

MR. ADAMS: Thank you.

MS. HUCKABAY: Okay. I am checking to see if anyone else would like to ask a question or provide a comment. If you are able to do so in Microsoft Teams, please raise your hand if you would like to ask a question. If you are participating by phone, please go ahead and come up on the line and ask a question.

(No response.)

Okay. It seems like we don't have any other questions at this time. And again, there will be an opportunity to ask questions or provide comments during the open discussion at the end. So, if you didn't have an opportunity to ask a question now, there should be another opportunity to do so later.

And for now, we're going to move on to the next section of the presentation, which is ASME Section III and Section XI, conditions under consideration as it relates to Quality Assurance.

MR. DIAZ-CASTILLO: Thank you, Victoria.

Next slide, please.

MS. HUCKABAY: Yes, and presenting this

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section is Mr. Yamir Diaz-Castillo.

Thank you.

MR. DIAZ-CASTILLO: Yes. Hi.

So, in Section III, we are revising the quality assurance condition to allow use of NQA-1 editions that are both incorporated by reference in 50.55a and also specified in either NCA-4000 or NCA-7000 of the 1989 or later editions of Section III.

This revision will allow licensees and applicants to use the 2011 Addenda to NQA-1-2008 and, also, the 2012 and 2015 Editions of NQA-1 when using the 2019 and later Editions of Section III, which, by the way, this rule is also incorporating by reference.

Next slide, please.

Similar to Section III, in Section XI we're doing the same thing. We are revising the QA conditions to allow use of NQA-1 editions that are both incorporated by reference in 50.55a and, also, specified in Table IWA-1600-1 of the 1989 or later Editions of Section XI.

And again, this revision will allow licensees to use the 2011 Addenda of NQA-1-2008 and the 2012 and 2015 Editions of NQA-1 when using the

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2019 and later Editions of Section XI, which, again, this rule is also incorporating by reference.

And we are also making a change, revision, to the paragraph in 50.55a to remove the reference to IWA-1400, given that the NQA-1 editions are actually referenced in Table IWA 1600-1 instead of IWA 1400.

Next slide, please.

MS. HUCKABAY: Yes, I think that's the end of your section of the presentation.

MR. DIAZ-CASTILLO: Yes.

MS. HUCKABAY: Okay. Thank you.

So, at this time, we will pause to see if there are any questions or comments that members of the public would like to provide for this section of the presentation.

Again, if you're participating using Microsoft Teams, please use the "Raise Your Hand" function.

And if participating by phone, please come up online, unmute yourself, and ask the question or provide your comment.

(No response.)

Okay. Well, it seems that at this time

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we don't have any questions on the QA conditions. So, again, if you decide to ask a question on this later, there will be an opportunity to do so.

But, for now, we will move on to the next section of the presentation, which is ASME Section XI, Conditions Under Consideration. And Keith Hoffman will be delivering this portion of the presentation.

MR. HOFFMAN: Hello. This is Keith Hoffman. I'm going to cover the modifications and the new conditions for Section XI.

For Section XI Condition xviii, which deals with NDE personnel certification, for paragraph (D) of that condition, based on research that was done at PNNL, we are planning to provide options for certification of Level I and Level II examiners.

And for Level I, the 250 experience hours for Level I could be reduced to 175 hours, with 125 experience hours and 50 hours of laboratory practice.

For Level II certification, it can be reduced to 720 hours with 400 hours experience hours and 320 hours of laboratory practice, and the successful completion of the Appendix VIII, Supplement 2, Detection and Length Sizing.

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For Section XI, Condition xxv, which deals with mitigation of defects by modification, the NRC is planning to relax some of the conditions on that with regard to future examinations and the elimination of some of the timings of those examinations.

Next slide.

For Section XI Condition xxvi, which deals with pressure testing of Class 1, 2, and 3 mechanical joints, the NRC is proposing to revise this condition to eliminate the reference to Section XI, pressure tests, and Section XI, NDE examiners, and planning to change that to a requirement for the licensees to do a licensee-defined leak check. This is consistent with what other industries are doing in accordance with the post-construction ASME Codes, and the NRC feels that some sort of leak checks should be done on these mechanical joints to ensure there's leak tightness.

For Section XI, Condition xxix, which deals with nonmandatory Appendix R, the NRC is proposing to allow the use of the 2017 and 2019 Editions of Supplement 2 without the submittal of an alternative. For use of Supplement 1, a submittal of

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an alternative would still be required, but if they want to use Supplement 2, a submittal would not be required.

For Section XI, Condition xxxii, which deals with the summary report submittal, the NRC is planning or proposing to extend the submittal timeframe for the summary report to 120 days, which is in accordance with the changes that were made to the 2019 Code for when the summary report or owner activity report would be required to be completed.

Next slide.

For XI, Condition xl, the NRC is modifying the condition to include the new provisions for IWC-3510.5(b) and Table A-4200-1 and Table G-2110-1. And this deals with the fracture toughness of certain materials. And this does not change the current requirements, but it maintains the existing testing requirements that licensees and applicants may use to show that ASME Section XI, Toughness Curve, is application to the high-strength ferritic steels.

Next slide. We went too far. Sorry.

NRC is proposing one new condition for Section XI, which is Roman numeral xliii, and deals with regulatory submittal requirements.

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In the 2019 Edition, there was a number of submittal requirements that were removed. I think it was a total of about 14. The NRC reviewed each of these subparagraphs and determined that three of these removed submittal requirements were necessary to allow the NRC to review plant safety with respect to the violation of pressure and temperature limits, ductile-to-brittle transition behavior of ferritic steels, and the effects of radiation embrittlement. And therefore, we're proposing a condition that would still require submittal for those conditions.

I believe that's the last slide for Section XI.

MS. HUCKABAY: Yes, this is correct. Thank you, Keith.

So, I see that we have some individuals who have raised their hand. So, I'll just go in the order I see you guys on the screen, and I apologize if that's not the order in which you have raised your hands.

So, we'll start with Mr. Gary Park.

MR. PARK: Thank you.

(Audio interference.)

MS. HUCKABAY: Mr. Park, if would you

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like to try again unmuting yourself. And it looks like you may be participating both by phone and on Microsoft Teams at the same time, and that would definitely create some feedback noise.

MR. PARK: Yes. Can you hear me okay?

MS. HUCKABAY: Yes.

MR. HOFFMAN: Hey, Gary, we can hear you.

MS. HUCKABAY: Yes, thank you.

MR. PARK: Hello?

MR. HOFFMAN: Hello, Gary.

MR. PARK: Hello?

MR. HOFFMAN: We can hear you, Gary.

(Audio interference.)

MS. HUCKABAY: Okay. I had to mute him for a second because I'm afraid that would create feedback again. I'll just give him a few more seconds to see if he can resolve technical difficulties he's having. Otherwise, we'll just go back to him later.

MR. HOFFMAN: Are you going to go to the next one?

MS. HUCKABAY: Yes. Mr. Tom Basso, please.

MR. BASSO: Good afternoon. Thank you.

This is Tom Basso from NEI, and I just

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have a couple of comments.

First of all --

MR. PARK: This is Gary.

MR. BASSO: Gary, do you want to go ahead?

MR. PARK: Yes. This is Gary Park from ASME. I was the Past Chair and I work for Iddeal Solutions.

Thank you, Tom, for letting me figure out this complicated system. So, I'm joining by phone, but I am muted on Teams. So, hopefully, you're not hearing the echo anymore.

I do have a couple of questions. Keith, on the removal of the VT-2 on the mechanical connection pressure test, and just requiring a utility to verify leak tightness of mechanical connections, I just wonder if it's appropriate to have it in a Section XI condition, wherein Section XI is not requiring a VT-2 on mechanical joints. I wonder if a better vehicle might be more appropriate for that particular requirement. And you can just cogitate on that a little bit.

The other question I have -- I actually have two more -- on the VT-2 - (xviii)(D)(2), where you talk about reducing the hours for the NDE -- I

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think it's NDE Level II --

MR. HOFFMAN: Correct.

MR. PARK: -- you're reducing the field experience down to 400 hours, and then, 320 hours for laboratory practice. I reviewed the PNNL document, and I didn't see where they came up with a number. I may have missed it.

But my suggestion is, if we reduce the field experience down to 320 hours, with a total of 320 for laboratory and 320 for field experience, that becomes more in line with the ANSI ASNT CP-189 requirement, which is around 603 hours. Just something to consider.

I don't know where the 400 hours came from. I couldn't find it in the PNNL document. I may have missed that.

And then, the final question is on the -- let me get to it; I apologize. The (b)(2) for xliii, which is a new condition, I think you need to specify the edition that that's applicable, as I look at the proposed rule. It doesn't say the 2019. I know your discussion said 2019, but I think you need to put that in the rule.

MR. HOFFMAN: Okay.

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MR. PARK: That's all my comments. That's all my comments.

MR. HOFFMAN: Thank you, Gary.

MR. PARK: Do you have any response for any of them or do you want to go on to Tom?

MR. HOFFMAN: I think we're going to have to consider the first comment about the leak test being in Section XI.

And without going back to the PNNL document, I don't have an answer for the second one right now.

MR. CUMBLIDGE: The 400 hours comes from taking -- this is Stephen Cumblidge for the NRC -- the 400 hours comes from taking the 800 hours and dividing it by two. Essentially, in other areas in other industries, they'll take the field experience, and then, half of it can be handled via laboratory practice. That's the substitution. And then, the 320 hours came from the previous -- or it comes from Section XI, the table, so the laboratory practice.

MR. PARK: Thank you.

MR. CUMBLIDGE: Thank you.

MR. HOFFMAN: And for the last question, it sounds like that probably would be appropriate,

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referencing 2019.

MR. PARK: Okay. Thanks. Thank you.

MR. BASSO: Yes, Victoria, this is Tom Basso again from NEI. Just a couple of comments.

One is I really appreciate the staff's efforts here in some of the relaxation that's occurring with these changes in the condition.

I just have kind of question or comment related to the Condition xxv on mitigating defects by modification, was there any other relaxation that the staff considered? And we will be providing a comment on that to try to even reduce this condition further, such that the owners can rely more on Section XI and the condition.

MR. HOFFMAN: There was a number of places where we relaxed the condition, and we'll gladly consider your comments on other ways to do it.

MR. BASSO: Okay. Thank you, Keith.

And then, my second comment is related to Condition xxvi on pressure testing. So, we do appreciate back last year the NRC dispositioning and providing a regulatory avenue so that we can use existing exemptions for IWA-4540(b).

We also appreciate the relaxation in

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going to the owners' program. However, the pressure testing and post-maintenance testing is covered by Appendix B programs.

Does the NRC believe or think that the requirement of a condition is redundant to what's required or covered by an Appendix B program?

In addition to that, you know, we will be providing a comment regarding the impact of keeping this in as a condition. This will require licensees to update their ISI program because now they're going to have to specify all of these requirements -- the leak test, medium pressure testing criteria, acceptance criteria. So, it may be actually just as onerous in the sense that we're going to have to track this by the IST OM programs versus what is covered by the Appendix B programs. Any thoughts related to that?

MR. HOFFMAN: Well, our intent was that licensees should be doing it in accordance with the Appendix B program. And our intent was to ensure that there was a method that ensured that there was a leak check done. We weren't actually intending them to do additional stuff.

MR. BASSO: Yes, so I think the way it's

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written, and the way it's being reviewed right now, is that it's going to require us to do additional items or programs. So, I'm getting at that the NRC's intent wasn't that we were requiring owners to have to update their program to have all of this in there.

So, you don't have to answer that, Keith. That's kind of our thinking, and we'll put it in a comment. And just consider it. With all that, we'd like the staff to consider maybe just completely removing this condition, since we believe it's already covered.

And that's all I had. That's all I had, Victoria.

MS. HUCKABAY: Okay. Thank you.

Okay. Mr. Christopher Koehler, please.

MR. KOEHLER: Yes, I'm Chris Koehler with Xcel Energy.

My comment is also related to the pressure testing of bolted connections. And Tom mentioned it, but when the final rule was published last year, there was a lot of confusion created by the language that stated that replacements requiring an NIS-2 required a leak check of the flanges. And that was taken literally to preclude the exemptions

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in IWA-4540(b), such as tube plugging inside a heat exchanger would require a VT-2 of flange joints that were required to conduct that, to get in the heat exchanger. And so, licensees had to submit reliefs last year to regain the ability to invoke IWA-4540(b) exemptions.

And I just noticed that the language is the same in the proposed rule, any replacements requiring an NIS-2. So, I wouldn't want to get in the same situation where people are having to request relief to get those exemptions back, although we do appreciate the relaxation of the VT-2 requirement there.

That's all I had to say.

MR. HOFFMAN: Thank you.

MS. HUCKABAY: Okay. Anyone else who has any questions or comments at this time, please unmute yourself and come on the line, and ask a question or provide a comment.

(No response.)

Okay. It seems like we don't have any other questions at the moment. So, we'll proceed to the next section of our presentation, which is ASME OM Code, Conditions Under Consideration. And Bob

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Wolfgang, please.

MR. WOLFGANG: Yes, hi. Good afternoon. This is Bob Wolfgang. I'm going to be going over some items of interest in this rulemaking for the OM Code.

Next slide.

The first item is proposing to remove the incorporation by reference of the 2011 Addenda of the OM Code from 50.55a(1)(iv)(B)(2) and, consequently, remove the condition on the use of the 2011 Edition specified in 50.55a(b)(3)(vii), and also, the reference to the 2011 Addenda in 50.55a(b)(3)(ix).

The next item, we're proposing to remove incorporation of reference of the 2015 Edition of ASME OM Code from 50.55a(a)(1)(iv)(C)(2) and the reference to the 2015 Edition in 50.55a(b)(3)(vii) and (b)(3)(ix).

And the reason we're removing these incorporations by reference to the 2011 Addenda and the 2015 Edition, the 2011 Addenda was incorporated by reference at the same time as the 2012 Edition. So, nobody is using the 2011 Addenda. The same thing with the 2015 Edition, it was incorporated by reference in 50.55a at the same time as the 2017

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Edition. So, licensees have to use the 2017 Edition. So, we're kind of cleaning up 50.55a and taking out that Addenda and Edition.

Next slide.

Also, we're proposing to incorporate by reference Subsection ISTE in the 2020 Edition of the OM Code without conditions. In previous conditions, we had a condition for use of ISTE. Licensees have to submit an alternative request. It has to be authorized by the NRC.

But we reviewed Subsection ISTE in the 2020 Edition, and all of our comments or concerns were addressed by the OM Code Committee. So, that's why we're incorporating this by reference with no conditions.

The next item, we're proposing to modify 50.55a(f)(4) to clarify the relationship between 50.55a(f)(4) and (g)(4) regarding the inservice testing or inservice inspections programs for snubbers. And this will include a provision to clarify that, for snubbers, inservice examination, testing, and service life monitoring for IST or ISI programs must meet inservice examination and testing requirements set forth in the applicable OM Code or

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BPV Code, Section XI. And this is already specified in 50.55a(b)(3)(v)(A) and (b)(3)(v)(B).

Next slide.

The next item, OM has removed the requirement for the submittal of the inservice testing program to the NRC, or what they said was the authority having jurisdiction over the site. They removed it in the 2020 Edition. So, because of that, we are proposing that 50.55a(f)(7), to require nuclear power plant applicants and licensees to submit IST plans and interim plan updates related to pumps and valves, and IST plans and interim plan updates related to snubber examination and testing, to the NRC. We'd like these to be submitted electronically, and updates can be submitted to the NRC when FSAR updates are submitted, on that frequency.

The last item we have is the consideration of proposed relaxation of the interval for position verification testing that's required in ISTC-3700 for valves that are not susceptible to stem-disk separation.

Right now, the Code states it's a two-year interval for testing. Our statement of

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considerations says we're considering increasing that to 10 years. And we also state that we're aware the ASME OM Committee was developing a Code Case on this to extend the interval to 12 years. And if that Code Case was approved and issued prior to us issuing this rulemaking, we would consider increasing it to 12 years, or we would consider adding that Code Case into the rule, similar to what we did with OMN-20 a few years ago. And we know that Code Case has been approved and issued. So, we are taking that under consideration.

And I think, Victoria -- no, there's one more.

MS. HUCKABAY: There's one more slide.

MR. WOLFGANG: Yes. On Condition 50.55a(b)(3)(iii), we're just changing the applicability date to read "April 17, 2018," instead of what it says now, "the date 12 months after April 17, 2017."

That's all I have.

MS. HUCKABAY: Thank you, Bob. I appreciate it.

So, at this time, we'll go ahead and turn to the members of the public, and I see that there

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are a few people who have raised their hands.

And we'll start with Mr. Ken Lowery, please.

MR. LOWERY: Thank you, Victoria.

This is Ken Lowery with Southern Nuclear.

Bob, I appreciate your description of the slides today. My question is on slide 28, particularly bullet 1, which is talking about the removal of the IST program plan submittal requirement from the 2020 Edition of the OM Code --

MR. WOLFGANG: Yes.

MR. LOWERY: -- and as a result of the OM Code removing paragraph (a) of IST 3200.

So, the previous edition stated that "IST plans shall be filed with the regulatory authorities having jurisdiction of the plant site." That's been interpreted different ways, but the basic interpretation that I've seen is that it is IST plan and it does not include the IST plan updates, as you had described in your presentation. So, it seems like either it's a clarification or it's an additional update being added to the regulation.

MR. WOLFGANG: Well, some licensees, we have been getting updates from; some probably not.

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But, yes, we want to clarify that we want the updates, because we use these plans and the updates a lot times when we're reviewing alternative requests that are submitted and relief requests that are submitted.

MR. LOWERY: Great. I understand that, and I've read that in the proposed rulemaking from last year where it was described. There's some instances that I've experienced where changes or interim changes to the plan could number six annually in that timeframe and --

MR. WOLFGANG: Right.

MR. LOWERY: -- it seems like it could be excessive, especially if there are no alternatives during that timeframe.

MR. WOLFGANG: Right, and that's why I stated you can collect these changes to interim updates to the plans and bundle them up and submit them when you submit your FSAR update.

MR. LOWERY: Okay. And our FSAR updates are typically quite voluminous. You mentioned electronic submittal. Is there new technology, like a portal, that has been developed, or what's the plan for that?

MR. WOLFGANG: Well, I don't know if you

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could submit it separate at the same time as the FSAR update, but if it's not really feasible for you, you know, we can work with you on that as to how to submit it.

MR. LOWERY: Okay. All right. Well, thank you for going into a little dialog with it. It still seems like a little excessive to submit all interim IST plans.

MR. WOLFGANG: Okay.

MR. LOWERY: But thank you for your comments.

MR. WOLFGANG: Thanks. You're welcome.

MR. LOWERY: That's all, Victoria.

MS. HUCKABAY: Okay. Thank you.

And next, Mr. Mark Gowin, please.

MR. GOWIN: Yes, good afternoon. My name is Mark Gowin. I work for Tennessee Valley Authority.

And I've got one question and a comment on two different conditions. The question is related to slide 10. It indicated in slide 10 that OM had one new condition. I don't recall seeing a new condition in my review, or maybe I just read it wrong, slide 10.

MS. HUCKABAY: Right.

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MR. WOLFGANG: Well, I think we were considering, for lack of a better term, adding (f) (7) as a condition, but it's actually not a condition.

MR. GOWIN: All right. That's fair. Okay. I'm good with that.

So now, I'll get on, if you don't mind, with my comments on the conditions.

The first comment is on the Condition (b) (3) (iv), OM condition on check valves.

MR. WOLFGANG: What slide is that on?

MR. GOWIN: It's not. Well, yes, it's not. You all, in the rulemaking, you only made minor changes to it. But the difference is now is the only time we get to see how you incorporated comments from the previous rulemaking, right? You know, this is our only opportunity to make comment, you know, to see how you incorporated the comments on the previous rulemaking, and address them now during this rulemaking.

My initial thought for this condition was that the intent of it was that the NRC was just trying to impose the staggered testing or activities that were originally implemented in, I think, the 2017 Edition of OM Code. And I thought that all they were

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trying to do was pull that forward to existing Codes up through what is 03, OM 03, or whatever it was.

But, as you look at the language in the actual condition, there is additional wording in there that's created a real burden for utilities to implement. The offending wording that bothers me, and that has created a lot of work, is the condition says at least one of Appendix II condition monitoring activities for a valve group shall be performed on each valve of the group at approximate equal intervals, and not to exceed the maximum interval shown on the following table.

That language "on each valve of the group at approximate equal intervals" is not part of the OM Code. And that has created new requirements. And as a result, we have been burdened with having to revise a large number of our condition monitoring plans to comply with this requirement.

I'll just give you a quick example, and not to bore everybody. But, for an example, if you've got a group of four valves that include two A-turning valves and two B-turning valves, under the OM Code rules of 2017 Edition and later, you could satisfy that by doing CM, condition monitoring, activities on

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two valves every other refuel outage. That would comply with Table 2-4001 of the OM Code. But you can't do that and comply with this condition.

So, in many cases, we had to go in and split the plans to provide a little compliance with this condition. And the net result of that is no real benefit, because once you start splitting valves into groups of one, you've done nothing to ensure the activities are staggered, which was the whole point of this to begin with; at least that's my understanding. So, I would ask that you all take a look at that language again.

My next comment is on Condition (b) (3) (vi), and again, that's not one that's part of this rulemaking, but now is our only opportunity to really comment on it, as far as I could tell. This condition was first published in 2003, and in that timeframe, it was a condition on the 2005 Addenda of OM Code. And that change in OM was when they moved from having to exercise manual valves quarterly to five years. And the condition restricted that to two years.

And if you read through the information back in those days, the NRC's analysis of public

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comments for those public comments that opposed the two-year restriction, they basically implied that the NRC was going to hold it to two years because the existing Code that allowed three months would let you defer to refuel, up to refueling outage, if you couldn't do it quarterly, every three months. So, they were comfortable with two years and wouldn't let it extend past two years because there was no operating history to support that.

I'm just recommending that we consider pushing that two years -- I mean the two years to four years, so that it will better support train outages and distribute the load in outages. I know, in some cases, that is causing us grief in outages and causes us to get into some risk-significant configurations when we have to do those manual valve exercises, as hard as that is to believe.

Anyway, I just wanted to bring that out to your attention, that I'll be making that comment.

MR. WOLFGANG: Hey, Mark?

MR. GOWIN: Yes, sir?

MR. WOLFGANG: That Condition (vi), it's applicable to the 1999-through-2005 Addenda to the Code.

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MR. GOWIN: Right. And what I want to try to do is, the reason that's the case is because, back in those days, the NRC conditioned it, the '05 Addenda. Then, later, the OM Code revised the five-year to two years to address the condition. So, I guess what I'm saying is, this is not purely to change it from two to four. And I would probably pursue that again, also, through the OM Code as well.

MR. WOLFGANG: Yes, but I don't understand why we would change this to four. I guess there's a few plants using the 2004 Edition.

MR. GOWIN: Well, I guess my point is, a condition can provide a restriction to OM Code, but it could provide a relaxation OM Code. So, I thought this might be an avenue to relax OM Code, as it stands now in 2020, until we can get a future Code change in place. That's all.

MR. WOLFGANG: Oh, okay. Thanks.

MR. GOWIN: I don't know that that's doable, but I'm just throwing that out there, and I'll make the comment and we'll see where it goes.

MR. WOLFGANG: Okay.

MR. GOWIN: Then, the last one I had was on the valve position indication, (b)(3)(xi). I

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really appreciate NRC working with us on this condition and adding the language that would allow the possibility to defer some of the supplemental position verification testing requirements for non-susceptible valves. That's a huge help to the industry, and in my opinion, it is real beneficial in targeting our resources into those valves that really matter and that really have a safety-related concern that we'll need to take care of. So, I think that's a great thing.

The only thing I'll add there is that, as you mentioned in your presentation, Code Case OMN-28 is now approved. I'll make a comment that asks the NRC to endorse use of that Code, as you suggested. So, I will be making that comment.

MR. WOLFGANG: And use of that Code Case, right?

MR. GOWIN: Yes, sir, that's correct.

MR. WOLFGANG: Yes.

MR. GOWIN: And as you also stated, that would go from 10 years to 12 years. I think using the Code Case just makes sense because it's a little more regimented process for if you have problems how to exit the process and get back in the process, if

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you make corrections and stuff. So, I think referencing the Code Case would be cleaner in the long run for everybody and ensure more consistent application of the condition.

And then, finally, as you know, there's been a lot of discussion in industry about the start time of the condition. I would like to see some clarification on that, because it gets especially tricky in that a lot of the supplemental position verification testing cannot be performed concurrent with the ISTC-3700 local observation test requirement.

And in some cases, the open and closed supplemental position indication testing can't be performed simultaneously. Some may be able to perform their normal operation under normal configurations, and other positions may require an outage to do, to get it in the right configuration. So, it gets real tricky trying to figure out what the expectation is for the timing on complying with this condition.

So, that's all I have, Bob.

MR. WOLFGANG: Okay. Thanks, Mark.

MR. GOWIN: Thank you.

MS. HUCKABAY: Okay. And next, we will

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go to Mr. Thomas Loomis, please.

MR. LOOMIS: Yes. Good afternoon. This is Tom Loomis from Exelon Nuclear, representing the views of the Codes and Standards Task Force through NEI.

And Mr. Lowery from Southern Nuclear stole a little bit of my thunder, but we want to mimic his views on the proposed change on the inservice testing reporting requirements. We are in opposition of that particular change. I think it's really important to understand, with that change that's being made, the additional regulatory burden and the unnecessary regulatory burden that's placed on the licensees for submittals of these IST reports.

And this clearly increases the frequency of the submittals, and I think it's fair to say that anyone understands, whether it be at NRC or a licensee, the increased cost to process submittals. You have cover letters. You have concurrence changes. You have processing of the letter. And also, this creates a lot of procedural revisions and action items to implement. So, it's a real administrative burden on the licensee. We believe that the rule change should focus on safety and simplification, which this

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does not.

More importantly, this particular change is inconsistent with the application of the inservice inspection program. There's a Code Case out there on the reduction of the program changes and submittals for ISI. So, this flies in the face of that through creating additional administrative burden.

Additionally, you're not going to get an up-to-date program anyway. If it falls within an FSAR frequency, the licensees have different submittal schedules for that. So, it doesn't really provide you with an up-to-date program anyway. And in our view, no program should be submitted anyway. And so, it flies in the fact of the other changes going on.

Now, when we submit relief requests, if the NRC requests portions of the plan or needs additional clarifications through the relief request, they are always welcome through the RAI process to ask those questions. So, we just don't see the justification for the unnecessary regulatory burden placed on the licensee.

And it's also important to understand that, when this goes into the Code of Federal

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Regulations, it creates a violation trap. Even though we may think, here right now looking at it, that it's a relatively simple change, it's not. It becomes looked at by a lot of different people. People interpret it differently, and the burden just escalates.

So, that's our views on this particular change. Thank you.

MR. WOLFGANG: So, let me ask you, so the burden is the submittal of the interim updates, the interim updates to the initial IST plan?

MR. LOOMIS: That's correct, yes. And, Bob, I really don't understand why we're submitting the plan at all, when you think about it, because, I mean, let's take an example. When we provide you a relief request to the inservice testing program, we usually prep those relief requests nine months prior to the beginning of the program, anyway. And so, you really don't see the program plan until well after the start of the interval. So, I'm not really sure that that gives you much value in your review if we're submitting them a year or nine months ahead of the Code change.

So, submitting the plan upfront I'm not

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sure provides you much value. And then, clearly, the interim changes don't provide value, at least in our view from our viewpoint, but I don't know how they provide you guys much value as well, but that's your side of the house. So, that's why we just don't believe any of the submittals of the interims should be made.

MR. WOLFGANG: Okay. And I guess you're going to submit that in writing as a comment?

MR. LOOMIS: Yes. We'll provide that to be a comment.

MR. WOLFGANG: Okay. Thanks, Tom.

MR. LOOMIS: Thank you.

MS. HUCKABAY: Okay. Thank you.

And our next question or comment would be from Mr. Glenn Weiss.

MR. WEISS: Yes, thank you. This is Glenn Weiss, representing Exelon as well as the NEI Code and Standards Task Force.

Again, Mark took some of my thunder here. We do appreciate and thank you for proposing supplemental verification of non-susceptible valves, relaxing that, as that will greatly reduce the testing burden.

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I have three general comments for supplemental verification. Again, Mark touched a lot on the first, in that the implementation timeline does need clarity with respect to the required start date of the supplemental verification. We also need clarity in the fact that the testing needs to be performed in conjunction with the IST-3700 testing, but not necessarily be concurrent with the 3700 testing.

Another somewhat confusing factor associated with the implementation of this supplemental verification is the fact that the MOV position verification testing frequency also changes at the same time you're implementing the supplemental verification. It goes from every two years to being in accordance with the Appendix III testing requirements.

So, this has created initial confusion and raised some questions on supplemental verifications required performance due dates. I'm also anticipating that the frequency change for non-susceptible valves will likely raise some similar questions. So, therefore, clarifying performance and due dates for extended frequency testing is going to

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be needed in this rulemaking.

My second comment is from a technical standpoint. You know, supplemental verification for passive valves should be eliminated or, at a minimum, only required performance of supplemental verification testing in the required position of that passive valve. Supplemental verification testing of these valves, of passive valves, has proven difficult to implement with no added increase in safety margin because the valves are not required to change position.

And then, finally, my third comment is, you know, from a coordination standpoint, there are approved relief requests that allow supplemental verification testing to be performed on other NRC-approved performance frequencies, such as Appendix J. So, the rulemaking should allow sites to perform supplemental verification testing in accordance with other NRC-approved performance-based processes that prove supplemental verification. And this would eliminate the need to request relief for these types of performance-based testing.

That's all I have. So, thank you for your consideration, and we will be putting these in

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for comment.

MR. WOLFGANG: Okay. Thanks, Glenn.

MR. WEISS: Uh-hum.

MS. HUCKABAY: Okay. Thank you.

And next would be Mr. Jeffrey Stumb.

MR. STUMB: Thank you.

Good afternoon, Bob. This is Jeffrey Stumb with Dominion Energy.

MR. WOLFGANG: Yes. Hi, Jeff.

MR. STUMB: I have a question on the (f)(4) paragraph, and this change isn't discussed in the PowerPoint presentation. But, in about the middle of the (f)(4) paragraph, where it discusses some valves that are non-Code class may be satisfied as an augmented IST, in an augmented IST program, and there's a phrase at the end of that sentence that was deleted that says, "without requesting relief under paragraph (f)(5) of this section or alternatives under paragraph (z) of this section."

So, I'm wondering if the NRC is expecting the utilities to submit relief requests now for non-Code class components that might deviate from OM Code requirements.

MR. WOLFGANG: No, we're not, as long as

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you had justification onsite there where our inspectors can look at it, look at the justification.

MR. STUMB: Do you know what the reasoning is for deleting that phrase then?

MR. WOLFGANG: Actually, I didn't know it was deleted. I'm going to ask Tom Scarbrough to speak to the details --

MR. SCARBROUGH: Yes. Yes, this is Tom Scarbrough.

Yes, Jeff, thanks for pointing that out. I'm looking at our current wording of what we had up until this proposed rule. It said: This use of augmented IST program may be acceptable, provided the basis for deviations from the OM Code are referenced and maintain a level of quality and safety, or that implementing the Code provisions would result in hardship or difficulty without an accompanying increase in level of quality and safety, "where documented and available for NRC review." I mean, that's what it says in what was issued before. Now, if there has been a change to that, you know, we'll want to look into that.

But the previous regulation said "where documented and available for NRC review." There was

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no statement that you have to submit an alternative request. So, if there's some confusion in the wording, we'll fix that, if you saw something like that. But there was never any intent to change that wording, and if we have to correct it, we'll correct it. But that is what it says, and that's what it was always intended to say.

MR. STUMB: Thanks.

Yes, it still reads to me as though it may not be required to request prior NRC approval, but it could insinuate that there might be some cases where prior NRC approval might be required.

MR. SCARBROUGH: Well, thank you for that. We'll look at it, and if we need to clarify The Federal Register notice in the final rule, we can do that, if there seems to be some confusion. But I thought we addressed that pretty clearly in the previous rulemaking, but if we need to revisit it, we can.

MR. WOLFGANG: Yes, just put that as a comment.

MR. STUMB: Yes, I will. Thank you.

MR. WOLFGANG: Okay. Thanks.

MR. STUMB: That was all I had.

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MS. HUCKABAY: Okay. Thank you.

And I see, Mr. Tom Basso, you raised a hand. Do you have another question or comment?

MR. BASSO: Yes, Victoria. Thank you very much. Again, it's Tom Basso from NEI.

And I just have a question related to the condition on supplemental position indication. A number of licensees are having to submit the relief related to the implementation, where, you know, because of the plant condition, the implementation can't occur within 24 months from the previous position verification testing.

I am just wondering if the Agency is considering some type of quicker regulatory path than the licensees having to submit relief requests, if there's a way that that can be done more effectively and more efficiently, rather than have each of the licensees come in and ask for that relief.

MR. WOLFGANG: I can't think of a more efficient way for that. I don't know, Tom, if you can think of one.

MR. SCARBROUGH: Well, I think we have had a couple of these come in already. And what we do is we fast-track them. I mean, we recognize, you

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know, we know exactly what questions we need to ask. We usually have a phone call to find out if we need any additional information. But, usually, within just a few days, we're ready to proceed. Either we did get the additional information or we're ready to prepare a Safety Evaluation.

So, we recognize that this is something that is of concern and sometimes it sneaks up on licensees. So, we do have a process in place to fast-track them, because we want to make sure that we still follow through and meet our regulations, but we definitely have a means in place with the IST group to fast-track these and move them through pretty quickly. So, we recognize the concern and we are doing our best to move these things as quick as we can.

MR. BASSO: Yes, and, Tom, if there's anything like enforcement discretion or something related where you know, because of the plant condition -- it's not that the licensees don't want to do it -- but, rather than the Agency getting all kinds of relief requests before the rule gets changed, and obviously, we're going to comment on suggestions on changing this condition, so that it alleviates

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having to put relief in. But that's what we're looking for; is there anything in the interim that the Agency can do? And you don't have to answer that right now, but that's something that we're looking at or we're requesting.

MS. BUFORD: So, Tom, this is Angie Buford, Branch Chief of the Mechanical Engineering Branch at the NRC.

We are looking into options there and working internally to see, you know, to specifically look at whether there's possibilities in that arena. And in the meantime, we are close to sending out an Information Notice that clearly discusses the position on the timeline for the SPI, but we are also looking into what tools there are. And so, we can't speak definitively yet because there are details that need to be worked out, but we've heard it and we're looking at it.

MR. BASSO: Okay. Thank you, Angie.

MS. HUCKABAY: Okay. Thank you for your question.

And I don't see any other attendees right now with their hands raised, but I would like to ask anyone who is participating by phone. I understand

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you would not have the ability to raise your hand in Microsoft Teams. If you have a question or a comment, please come up on the line and ask your question now.

(No response.)

Okay. It looks like there are no comments or questions at this time.

And again, I would like to remind you that, if you would like to submit your comments in writing in the docket, which is what we would like to encourage you to do, you can go to www.regulations.gov and type in the Docket ID No. in the search box. The Docket ID No. is shown here on this slide. It's NRC-2018-0290.

And when you do a search on this Docket No., it will bring up the ASME 2019-2020 Code Editions Rulemaking, and you will see a blue button that says, "Comment," and you will be able to submit your comment.

So, once again, at this time, I would like to ask if anyone in the audience, any of the attendees have any questions or comments that they would like to provide on the subject of our presentation today. And I will pause here for a minute to allow any members of the public to come up

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on the line, unmute themselves, and ask a question or provide a comment.

MR. HOKE: I do have a question for clarification. This is Bob Hoke, H-O-K-E. I'm with Exelon Corporation.

And this concerns the visual inspection of bolting material for Section III, 2017 and later Editions. I'd just like to clarify or get clarification that that would apply when the customer's spec invokes Section III, 2017 Edition or later, and not just a component that has been manufactured to 2017 Edition or later, and then, reconciled back to the Code of Construction.

DR. BASAVARAJU: This is Pani Basavaraju.

That's a Section III condition from the 2017 Edition of the Code. The visual inspection involves studs and nuts.

Do you have a specific comment you wanted to add?

MR. HOKE: Well, as I say, I just wanted to make sure that that was where the customer's spec invoked Section III 2017 Edition or later.

DR. BASAVARAJU: Yes, that's correct.

MR. HOKE: Okay. Thank you.

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DR. BASAVARAJU: Thank you.

MS. BUFORD: Victoria, this is Angie Buford again, the Branch Chief of the Mechanical Engineering Branch.

I just wanted to add -- I didn't mention this before, but was notified by management above me -- I believe we are going to propose having an additional public meeting specifically on the supplemental valve position indication subject and discussing both from the licensee end what bin people are falling in and discussing what tools might be available.

Potentially, depending on availability, the timeline might be somewhere around the OM Code meeting, which I believe is the 14th, so at some point prior to that, but closely tied. And so, I just wanted to give people a heads-up on that, that there is a desire to discuss the situations that particular licensees are in, and then, also, for NRC to give clarity on potentially having tools to address the timeline situation. So, I wanted just to add onto my previous statement.

MS. HUCKABAY: Okay. Thank you. Thank you, Angie. I appreciate that.

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Any other members of the public who would like to ask a question or provide a comment at this time, please unmute yourself, and provide your question or comment.

(No response.)

All right. It looks like we don't have any questions at this time.

So, I would like to thank you very much for your attention and your participation in this meeting.

And again, if you would like for the comments that you provided during the meeting today to receive formal consideration in the rulemaking process, please submit them in writing using one of the methods that we discussed earlier today.

We welcome feedback on our public meetings. We want you to know, if you are satisfied with today's public meeting or if you have any suggestions for how we could make it more effective, please let us know. You can access the link to the online feedback form and the meeting details for this meeting on the NRC's public meeting schedule page. Or, alternatively, you can scan this QR code, and it will bring you directly to an online feedback form

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for this meeting. You can also access the online feedback for this meeting by going to our public meeting website.

My contact information is here on this slide. So, if you have any questions about this meeting, please feel free to reach out to me.

We will be preparing a public meeting summary and making it publicly available within the next few weeks. So, if you would like to review it, that will be definitely available in the public domain.

And the easiest way to reach out to me would be by email. That's victoria.huckabay@nrc.gov.

And we just have the last slide with the acronyms that we used today in the meeting here on the last slide for your information and for your use.

Again, thank you for attending. Have a great afternoon.

And our meeting is now concluded.

(Whereupon, at 2:34 p.m., the meeting was concluded.)

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