

## **Industry / NRC Materials Programs Technical Information Exchange**

# **Rulemaking Plan On Revision Of Inservice Testing And Inservice Inspection Program Update Frequencies Required In 10 CFR 50.55a**

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# Purpose of the Rulemaking Plan



- SECY-21-0029 (ML20273A284) was issued March 15, 2021
- Request Commission approval to initiate a rulemaking to amend 10 CFR Part 50.55a to extend the interval of inservice testing (IST) and inservice inspection (ISI) program updates
  - Current 120-month update interval would be extended to 240 months, after updating to the most recent Codes and addenda incorporated by reference in § 50.55a.
- Request Commission approval for a **potential** subsequent rulemaking to extend update interval from 240 months to 288 months

# Other Items Considered

- Original effort began as an NRR EMBARK Venture Studios (EVS) project (ML20153A752)
- Identified 3 recommendations to pursue:
  - Relax the requirement to update IST and ISI programs every 120 months
  - Institute direct final rules for unconditionally approved code cases
  - Decrease frequency of ASME Code editions rulemakings
- First item is subject of the rulemaking plan, but all three were discussed in paper

# Technical Basis

- Major modifications to ASME Codes typically take more than a decade
  - 2009 Edition of OM Code included improved IST requirements for motor-operated valves in response to a 1989 NRC Generic Letter.
  - 2017 Edition of OM Code included improved IST requirements for active air-operated valves in response to a 2000 NRC Regulatory Issue Summary.
- Discovery of new degradation mechanisms has slowed greatly in recent years
  - Last degradation mechanism discovered was primary water stress corrosion cracking, which was in the early 2000s. Subsequently addressed in ASME BPV Code Section XI.
- Discovery of new degradation mechanisms or performance issues are typically first addressed by ASME using Code Cases before incorporating into an edition

# Rulemaking Scope

- The proposed rulemaking would double the time between updates for the licensee's Codes of record for IST and ISI programs from **120 months** to **240 months** for licensees that update to the most recent edition and addenda of the ASME OM Code and BPV Code, Section XI incorporated by reference.
  - 10 CFR 50.55a(f)(4) and 10 CFR 50.55a(g)(4) primarily affected
- Potential future rulemaking to extend the update requirement from 240 months to 288 months
  - If ASME extends the ISI interval from 10 to 12 years

# ACRS Interaction



- Staff presented the rulemaking plan to ACRS full committee on July 7, 2021 (ML21180A017)
- The rulemaking plan was well received
- ACRS wrote a letter of support to the Commission (ML21203A205)
  - ACRS concurs with the proposed recommendations in SECY-21-0029 to extend the required ISI/IST plan update interval from 120 months to 240 months, with a potential future extension to 288 months
  - ACRS recommends staff should move expeditiously to implement the two additional recommendations in the EMBARK Venture Studio's report regarding streamlining rules for Code Case approval and decreasing the frequency of Code Edition rulemakings