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Docket: NRC-2021-0166

Acceptability of ASME Section XI, Division 2, 'Requirements for Reliability and Integrity Management (RIM) Programs for Nuclear Power Plants,' for Non-Light Water Reactors

Comment On: NRC-2021-0166-0001

Acceptability of ASME Code Section XI, Division 2, Requirements for Reliability and Integrity Management (RIM) Programs for Nuclear Power Plants, for Non-Light Water Reactors

Document: NRC-2021-0166-DRAFT-0010

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General Comment

Thank you for preparing this draft regulatory guide. This guide will help move the industry forward. Please consider the enhancements below.

The purpose of the regulatory guide is specific to non-LWRs (as defined on page 1, paragraph 1). While the regulatory directive may be specific to non-LWRs, Section XI, Division 2 is also applicable to LWRs. A user could misinterpret the current regulatory guide to preclude the use of Division 2 for reactors using light water. The final regulatory guide should be enhanced to include a brief reference to the process for an applicant to meet the requirements of Division 2 for LWRs in lieu of the requirements of Division 1 (such as through 10CFR50.55a).

Section C.8 states that: The provisions of ASME Code, Section XI, Division 2, should not be used to depart from matters governed by the construction code of the plant. This item should be clarified by amending 'without prior notification and NRC review.'

Section C.11 states that: Mandatory Appendix V tables should be considered in the development of MANDE requirements and RIM strategies for components designed to very low or atmospheric pressures. This item should be clarified by amending 'and document how the tables were considered.'