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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-0011

Comment on FR Doc # 2021-21295

Submitter Information

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Organization: Nuclear Energy Institute

General Comment

See attached file(s)

Attachments

11-15-21_NRC_Comments on DG-1383

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November 15, 2021

Office of Administration
ATTN: Program Management, Announcements and Editing Staff
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Regulatory Guide (DG), DG–1383, “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” [Docket ID NRC–2021–0166]

Project Number: 689

Submitted via Regulations.gov

Dear Program Management, Announcements and Editing Staff:

On behalf of the Nuclear Energy Institute’s (NEI)¹ members (hereinafter referred to as industry), we appreciate the opportunity to provide comments on the U.S. Nuclear Regulatory Commission’s (NRC) draft regulatory guide (DG), DG–1383, “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.” This DG endorses, with conditions, the 2019 edition of ASME BPV Code, Section XI, Division 2. It also describes a method that applicants can use to incorporate PSI and ISI programs into a licensing basis. ASME BPV Code, Section XI, Division 2 provides a process for developing a RIM program similar to a traditional PSI and ISI program under ASME Code, Section XI, Division 1, “Rules for Inspection and Testing of Components of Light-Water-Cooled Plants,” but for non-LWR nuclear power plants.

We support the provisions enabling use of probabilistic risk assessment (PRA) to develop reliability targets for structures, systems, and components (SSCs) within the scope of the program, and establishing practices like monitoring, nondestructive examination, and repair and replacement to develop strategies informed by

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI’s members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

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expert panels, inspection results and identified degradation mechanisms to maintain the reliability of SSC components. The attachment provides several specific comments.

Again, we appreciate the opportunity to provide these comments for NRC consideration. If you have any questions or require additional information, please contact me at 202-439-0954, mar@nei.org.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Richter". The signature is written in a cursive, flowing style.

Mark A. Richter

Attachment

- c: Timothy Lupold, Office of Nuclear Reactor Regulation, NRC
- Robert Roche-Rivera, Office of Nuclear Regulatory Research, NRC
- Stephen Philpott, Office of Nuclear Regulatory Research, NRC
- Meraj Rahimi, Office of Nuclear Regulatory Research, NRC

NEI Comments on DG-1383

Affected Section	Comment/Basis	Recommendation
<p>1. Page 4, Background</p>	<p>1. Draft DG-1385 states (as does RG 1.232):</p> <ul style="list-style-type: none"> a. ARDC-14 states that the reactor coolant boundary shall be tested so as to have an extremely low probability of abnormal leakage, of rapidly propagating failure, and of gross rupture. b. ARDC-30 indicates that the components that are part of the reactor coolant boundary shall be tested to the highest quality standards practical. c. ARDC-32 provides that the components that are part of the reactor coolant boundary shall be designed to permit periodic inspection and functional testing of important areas and features to assess their structural and leaktight integrity. 	<p>These guidance statements may not be applicable to an AR design that does not rely on the reactor cooling system (and particularly the pressure boundary) for safe shutdown and prevention of large releases. While footnote 2 acknowledges the requirements are based on water-cooled plants, no basis is provided why these are applicable to what may be non-safety components. Consider removing the statements, particularly references to pressure boundary, and add clarification and basis for why these ARDC statements were chosen to be applicable.</p>