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# PUBLIC SUBMISSION

**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-0012

Comment on FR Doc # 2021-21295

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## General Comment

The comments that are to be submitted are contained in the attachment file called: DG-1382 Comments [which is in pdf format].

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## Attachments

DG-1383 Comments

**To:** USNRC, Office of Administration, Program Management,  
Announcements and Editing Staff

**Subject:** Comments on Draft Regulatory Guide DG-1383 – Acceptability of ASME Section XI, Division 2, “Requirements for Reliability and Integrity Management (RIM) Program for Nuclear Power Plants” for Non-Light Water Reactors

The Staff has done an excellent and thorough review of the 2019 Edition of Section XI, Division 2 and have identified areas requiring regulatory guidance and my comments will be primarily addressing those items in Section C of the DG-1383. As background, I have been involved in the development of RIM for more than 15 years and followed as well as provided input to its evolution. Several other RIM committee members (Tom Roberts and Henry Stephens) have provided comments and recommendations. I strongly support their input and will not repeat them in my response.

### **1. Regulatory Guidance 1, Page 14**

**Comment:** The 10<sup>th</sup> bullet appears to be redundant with Regulatory Guidance 3.

**Recommendation:** Unless redundancy is the goal, one of these should probably be deleted and my suggestion is to delete the 10<sup>th</sup> bullet.

### **2. Regulatory Guidance 5, Page 15**

**Comment:** There is confusion regarding the personnel requirements because ASME Section III requires meeting SNT-TC-1A, Section XI Division 1 has upgraded from SNT-TC-1A and requires meeting CP-189 and Section XI Division 2 identified issues with both of these standards and requires meeting ANDE-1-2015. Having three different personnel standards is going to lead to significant inconsistencies from owner to owner. The NRC needs to reduce the inconsistency by adopting one of these standards.

**Recommendation:** The NRC needs to adopt ANDE-1-2015 and make this uniform for all Section XI, Division 2 nuclear applications. The question then becomes what evidence does the NRC need in order to endorse ANDE-1-2015?

### **3. Regulatory Guidance 8, Page 16**

**Comment:** This position is a contradiction in the use of Section XI Division 2 since RIM is to be actively involved in nuclear power plants entire life span beginning with design and construction. Current construction practices are based on Section III workmanship standards that are outdated and result in needless repairs which result in putting lower quality components into service because the repairs change many things including the residual weld stresses, weld chemistries, ISI inspection volumes, etc. Section XI has evolved and uses a fitness for service approach for addressing the significance and recommended management of flaws.

**Recommendation:** Section XI Division 2 must be an integral part of the construction code and this regulatory guidance item needs to be changed to reflect this. The rationale for changes to the construction code in the RIM Program must be developed and documented for review and approval by the regulators.

### **4. Regulatory Guidance 11, Page 16**

**Comment:** It is somewhat unclear as to what is needed regarding the use or nonuse of Mandatory Appendix V.

**Recommendation:** Regulatory Guidance 11 needs to be revised to require that the rationale for the use or nonuse of Mandatory Appendix V be documented as part of the RIM Program.

## 5. Generic Comment

**Comment:** Since this new Section XI Division 2 is for non-LWRs where there is no operating experience and there will be new materials, new designs, new fabrication methods and new operating conditions thus creating extensive uncertainties. The RIM Program is going to use the latest tools such as PRAs as well as any laboratory studies, non-nuclear applications and expert judgement for identifying all safety related structures, systems, and components (SSCs) that are to be included in the RIM Program and hopefully to address these uncertainties. Based on experience for the operating fleet of reactors, there have been surprises which occurred during operation (see for example NUREG-0531 (primarily BWRs) and NUREG-0691 (PWRs)). It is reasonable to expect that with the new advanced non-LWRs without any operating experience, these uncertainties may lead to surprises. It is not clear in DG-1383 how the NRC will address these uncertainties regarding safety significant SSCs in the RIM Program and the majority of SSCs that are not included in the RIM Program because they were not considered safety significant?