

**From:** [Beasley, Benjamin](#)  
**To:** [peebles@kairospower.com](mailto:peebles@kairospower.com); [Jim Tomkins](#)  
**Cc:** [Cuadrado de Jesus, Samuel](#); [Helvenston, Edward](#); [Chereskin, Alexander](#); [Honcharik, John](#); [Schmidt, Jeffrey](#); [Philpott, Stephen](#)  
**Subject:** Accident Analysis Audit Question 82  
**Date:** Thursday, September 08, 2022 4:31:00 PM

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Drew and Jim,

We have a question on the implementation of ASME Code Section III Division 5. This question is part of the Chapters 4 and 13 accident analysis audit. We are prepared to discuss this question when Kairos is ready.

**Question 82**

In the draft NRC staff endorsement of ASME Code Section III Division 5 (DG 1.87, Revision 2), there are proposed limitations on stress rupture values for 316H at certain times and temperatures. The staff is currently resolving public comments regarding the draft guide and is considering the public comments that suggest relaxing the proposed limitations. However, the staff notes that certain statements in Chapters 4 and 13 of the Hermes PSAR do not appear to include consideration of the limitations in the staff's endorsement. The staff also notes that the information in the PSAR is not consistent with the current accident scenarios provided in the metallic materials topical report. Please clarify or justify the use of stress rupture values for 316H SS at temperatures and times that may not be consistent with the planned Staff endorsement of Division 5 or the metallic materials topical report.

Regards,  
Ben

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Benjamin Beasley  
Senior Project Manager  
Advanced Reactor Licensing Branch 1  
Office of Nuclear Reactor Regulation  
301-415-2062  
[Benjamin.Beasley@nrc.gov](mailto:Benjamin.Beasley@nrc.gov)

