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American Society of Mechanical Engineers Code Cases and Update Frequency (Rev. 40)

Comment On: NRC-2018-0291-0018

American Society of Mechanical Engineers Code Cases and Update Frequency; Extension of Comment Period

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Comment on FR Doc # 2023-09218

Submitter Information

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Organization: Southern Nuclear

General Comment

Please see attached

Attachments

NL-23-0494

June 16, 2023

NL-23-0494

Secretary, U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, D. C. 20555-0001

Southern Nuclear Operating Company
Comments Concerning Proposed 10 CFR 50.55a Rule Change
and Draft Regulatory Guide (DG)-1406, Proposed Revision 21 to RG 1.147

Ladies and Gentlemen:

On March 6, 2023 the U. S. Nuclear Regulatory Commission (NRC) published Federal Register Notice (FRN) 88 FR 13717 issuing a proposed 10 CFR 50.55a rule change and draft regulatory guides, including DG-1406, ASME Section XI Division 1 Code Case Acceptability, for public comment. Southern Nuclear Operating Company (SNC) offers the comments within the Enclosure for consideration by the NRC regarding DG-1406 and FRN 88 FR 13717.

This letter contains no NRC commitments. If you have any questions, please contact Amy Chamberlain at 205.992.6351.

Respectfully submitted,



Amy C. Chamberlain
Nuclear Licensing Manager

ACC/dsp/cbg

Enclosure: Comments Concerning 10 CFR 50.55a Proposed Rule

cc: Southern Nuclear Operating Company
SNC Document Services - RType: CGA02.001

Comments Concerning Proposed 10 CFR 50.55a Rule Change
 and Draft Regulatory Guide (DG)-1406, Proposed Revision 21 to RG 1.147

DG Section/Code Case or Rule	Comment	Recommendation
Code Case N-921	<p>The proposed condition in conjunction with 10CFR50.55a revisions appears to be administrative based rather than a safety concern. Provided previous editions and addenda were reviewed and approved for use by the NRC, the NRC provides no safety basis limiting Owners to using the 2019 Edition or later of ASME Section XI for the code of record prior to applying the code case. Plants that have recently updated ISI programs to editions earlier than the 2019 Edition, would have to update the program before a mid-interval code update or wait until the end of the current interval to adopt this code case. If safety significant changes exist in the 2019 Edition that warrant this condition, then a corresponding condition should exist in 10 CFR 50.55a requiring Owners currently using an earlier Edition/Addenda of ASME Section XI, to apply those requirements from the 2019 Edition. The existence of any such conditions in 10 CFR 50.55a makes this condition to Code Case N-921 unnecessary.</p>	<p>Approve Code Case N-921 with no conditions that limit it to the 2019 Edition or later of ASME Section XI such that Owners would be allowed to use Code Case N-921 with any previously approved code of record, with all applicable 10 CFR 50.55a conditions.</p>
Sections 50.55a(y)(3) and, Section 50.55a(y)(6)	<p>These definitions are not definitions as they are pointers to ASME OM and Section XI requirements for intervals. There appears to be no need for these definitions.</p>	<p>These definitions should not be added to the 10 CFR 50.55a rule.</p>
Sections 50.55a(y)(4) and, Section 50.55a(y)(5)	<p>These definitions could create confusion and conflicts with ASME OM and Section XI since there are items in these definitions that are not discussed in ASME OM or Section XI references to "Program." There is no clear need for these definitions, and they would likely result in unintended consequences and issues between the rule and the codes.</p>	<p>These definitions should not be added to the 10 CFR 50.55a rule.</p>