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June 23, 2023

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

**Project Number: 689**

**Subject:** Supplement to NEI Comments on Proposed 10 CFR 50.55a Rule Change and Draft Regulatory Guide DG-1407, Proposed Revision 5 to RG 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Docket ID NRC-2018-0291.

Dear Rulemakings and Adjudications Staff,

The Nuclear Energy Institute (NEI)<sup>1</sup>, on behalf of our members, submitted comments on the proposed 10 CFR 50.55a Rule Change, and Draft Regulatory Guide DG-1407 on proposed revisions to Regulatory Guide 1.192 on June 15, 2023. Comments were made on the change to both Sections 50.55a(y)(2)(i) and the proposed Reg Guide 1.192 condition on OM Code Case OMN-31 that require licensees to be adopt OM Code 2020 Edition. As noted in our June 15 comments, NEI was in the process of working with ASME OM to provide a detailed comparison of the ASME OM 2017 and 2020 Editions at the time our comment letter was submitted.

NEI received permission from ASME OM to use the ASME OM 2020 Summary of Changes to compare the changes from OM 2017 Edition to the 2020 Edition. Attachment 1 documents the evaluation of each change from OM 2017 to OM 2020 and shows the changes are mainly administrative, clarifications, editorial, and corrections. The few technical changes are not substantive and did not remove any requirements for testing or examinations. Therefore, the changes will have no impact on safety. We respectfully request that the NRC consider the attached change evaluation as a supplement to our June 15 comments. We believe the evaluation demonstrates that there is no safety basis for the condition included in the proposed rule that requires licensees to implement the ASME OM 2020 Edition to use OM Code Case OMN-31. Making this revision would extend the application of the proposed rule change and the code case to more licensees,

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<sup>1</sup> 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.

Rulemakings and Adjudications Staff

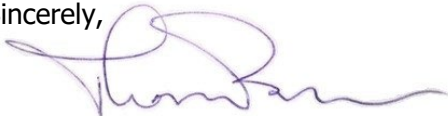
June 23, 2023

Page 2

without the significant and unnecessary burden of having to update their Inservice Testing Program to the OM 2020 Edition.

NEI requests the NRC consider this supplemental information as part of the comments submitted in our letter dated June 15, 2023. Please contact me at [tbb@nei.org](mailto:tbb@nei.org) or (484) 366-7534 with any questions or comments about the content of this letter or the attachment.

Sincerely,



Thomas Basso

Attachment

c: Andrea Veil, NRR/NRC  
Robert Taylor, NRR/NRC  
Andrea Kock, NRR/NRC  
NRC Document Control Desk

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**Attachment 1: Industry Review of Summary of Changes to OM 2017 Edition Incorporated for the OM 2020 Edition**

Following approval by the ASME OM Committee and ASME, and after public review, ASME OM-2020 was approved by the American National Standards Institute on May 11, 2020.

ASME OM-2020 includes the following changes identified by a margin note, **(20)**.

<i>Page</i>	<i>Location</i>	<i>Change</i>	<i>Type of Change</i>
1	ISTA-1400	(1) Revised	<b>Administrative:</b> Adds responsibility to the Owner to ensure specific revisions of standards and specifications are acceptable for use.
		(2) Table ISTA-1400-1 deleted	<b>Administrative:</b> Table with specific year / revision of referenced standards and specifications was deleted based on chance in ISTA-1400
4	ISTA-3200	(1) Former subpara. (a) deleted, and remaining subparagraphs redesignated	<b>Administrative:</b> Removed requirement to file IST Plan with regulatory authority. This requirement has been relocated to NRC’s jurisdiction in 10 CFR 50.55a for the USA.
		(2) Subparagraph (e) added	<b>Administrative:</b> New subparagraph which replaces previous (f)(1), (f)(2), and (f)(3) to relocate requirements for determining the code of record for preservice and inservice intervals from OM to the regulatory authority.
5	ISTA-5000	Revised	<b>Administrative:</b> New Section and language which simply points to applicable subsections of OM for the specific test requirements
5	ISTA-6000	Revised	<b>Administrative:</b> New and language which simply points to applicable subsections of OM for the monitoring, analysis, and evaluation requirements
6	ISTB-1400	Subparagraph (d) revised	<b>Administrative:</b> Revised language to remove reference to Appendix V which was incorporated into ISTB
6	ISTB-2000	Definitions of <i>baseline test</i> and <i>pump periodic verification test</i> added	<b>Clarification:</b> New definition for “baseline test” to replace the term “preservice test” to clarify the test is required regardless of whether it is during the preservice period or inservice period. The test requirements (when and how) have not changed - just the name in order to eliminate confusion.  <b>Administrative:</b> Definition for “periodic verification test” was relocated from Appendix V to ISTB-2000 as part of integration of Appendix V into ISTB.
6	ISTB-3100	(1) First paragraph and subpara. (c) revised	<b>Clarification:</b> Language was changed as part of the change from “preservice test” to “baseline test” to clarify that the baseline test is requirements are applicable in both preservice and inservice periods.

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		(2) Subparagraph (d) deleted	<b>Administrative:</b> Deleted unnecessary subparagraph. ISTB-3100(d) is duplicate of ISTB-3100(c) since both pump types are positive displacement pumps and reference the same section, ISTB-5310
7	Table ISTB-3000-1	Second column head and Note (1) revised	<b>Administrative:</b> Part of the larger change of “preservice test” to “baseline test”
7	ISTB-3310	Revised in its entirety	<b>Clarification and Administrative:</b> ISTB-3310 was restructured to split requirement into two new subparagraphs ISTB-3311 and ISTB-331. These new subparagraphs clarify when a “baseline” test (previously designated as a “preservice” test) is required. The new language reflects the original intent of when a “preservice test” was required and is consistent with how the industry has implemented the previous editions of OM with respect to “preservice testing.” This clarification is part of the larger change of “preservice test” to “baseline test”
8	Table ISTB-3400-1	Note (1) revised	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
8	ISTB-3400	Revised	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
9	Table ISTB-3510-1	(1) Third column head revised (2) Fourth column added	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test” <b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
9	ISTB-5000	Revised	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”
10	ISTB-5110	Title and subpara. (a) revised	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”
10	ISTB-5122	First paragraph and subparas. (c) and (d) revised	<b>Correction:</b> Corrected language from an earlier code change which allowed variance from the fixed reference value. The variance language was inadvertently included in the section for Group B pump tests although it should not have been applicable since only one hydraulic parameter is required to be measured.
11	ISTB-5124	Added	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
12	ISTB-5210	Title and subpara. (a) revised	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”, and <b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V

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12	ISTB-5222	First paragraph and subparas. (c) and (d) revised	<b>Correction:</b> Corrected language from an earlier code change which allowed variance from the fixed reference value. The variance language was inadvertently included in the section for Group B pump tests although it should not have been applicable since only one hydraulic parameter is required to be measured.
13	ISTB-5224	Added	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
13	ISTB-5310	Title revised	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”
14	ISTB-5322	First paragraph and subparas. (c) and (d) revised	<b>Correction:</b> Corrected language from an earlier code change which allowed variance from the fixed reference value. The variance language was inadvertently included in the section for Group B pump tests although it should not have been applicable since only one hydraulic parameter is required to be measured.
16	ISTB-5324	Added	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
16	ISTB-6000	First paragraph added	<b>Clarification:</b> Added language to better differentiate when systematic error (ISTB-6300) can be used versus corrective action (ISTB-6200)
16	ISTB-6200	Subparagraph (b) revised	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
16	ISTB-9100	Subparagraph (e) added	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V
18	ISTC-1200	Subparagraph (d) revised	<b>Administrative:</b> Removed reference to Category A and Category B as it was determined to be unnecessary to distinguish different possible categories of safety and relief valves
19	ISTC-3000	ISTC-3800 deleted	<b>Administrative:</b> ISTC-3800 was renumbered to ISTC-4000. The actual text of the paragraph did not change. Title of ISTC-4000 was revised accordingly
20	Table ISTC-3500-1	(1) Third entry in first column and fifth entry in last column revised (2) Note (4) added, and subsequent Notes redesignated	<b>Clarification:</b> Added Note 4 to provide a pointer to Mandatory Appendix I for PORVs <b>Clarification:</b> Added Note 4 to provide a pointer to Mandatory Appendix I for PORVs. The language of the referenced Appendix I paragraphs did not change.
22	ISTC-4000	Revised	<b>Administrative:</b> ISTC-3800 was renumbered to ISTC-4000. The actual text of the paragraph did not change. Title of ISTC-4000 was revised accordingly
23	ISTC-5112	Revised	<b>Clarification:</b> Added reference to specific paragraphs of Mandatory Appendix I

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28	Subsection ISTD	Title revised	<b>Administrative:</b> Title change only. Changed words “Examination and Testing of” to “Requirements for”
28	ISTD-1110	Revised	<b>Clarification:</b> Added language to refer to ISTD-1800
28	ISTD-1400	(1) First paragraph and subpara. (b) revised  (2) Subparagraph (d) added	<b>Clarification:</b> Revised language to clarify emphasize the requirements of Subsection ISTA must be met. Technically, this is redundant since you can’t get to Subsection ISTD without going through ISTA. <b>Administrative:</b> Change to be consistent with the title change of Subsection ISTD
28	ISTD-1600	Revised	<b>Clarification:</b> Added “repair and” to better reflect the title of ISTD-1600, Snubber Modification and Replacement
29	ISTD-1800	Revised	<b>Clarification:</b> Language changed to better clarify when the evaluation requirements of ISTD-1800 apply. The evaluation requirement itself is unchanged.
29	ISTD-2000	(1) Definition of <i>service life</i> revised  (2) Definition of <i>service life monitoring</i> added	<b>Clarification:</b> Changed “an item” to “a snubber” and added clarification “at its installed location.” <b>Clarification:</b> New definition to better describe the overall intent of service life monitoring required by ISTD-6200. Note that the requirements of ISTD-6200 have not changed.
30	ISTD-3240	Revised	<b>Clarification:</b> Added language to clarify intent which includes newly identified design difference.
30	ISTD-4110	Revised	<b>Clarification:</b> Minor change in language to replace the term “supported system” with “affected systems, structures, or components” to reduce confusing terms
33	ISTD-5240	Revised	<b>Technical:</b> Relaxed timeframe for start of pre-outage activities from 60 days to 92 days. While this is technically a relaxation in requirements, it is intended to provide flexibility for implementation of ISTD requirements. It doesn’t change the actual testing or examination requirements.
35	ISTD-5331	Revised	<b>Editorial:</b> Revised formula by replacing mathematical expressions with defined terms, then defining those terms using the previous mathematical expressions. Overall, there was no change to the math or results - the only thing that change is how it is written.
37	ISTD-6000	(1) Title revised  (2) ISTD-6100 and ISTD-6200 revised in their entirety	<b>Administrative:</b> Revised title to better represent the subordinate requirements <b>Clarification:</b> Revised language to better reflect original intent. While the language was changed considerably, the revised language doesn’t add or remove requirements that weren’t originally intended to be performed
38	ISTD-9500	Added	<b>Technical:</b> Added new requirement for maintaining service life records. While this changed is identified as “Technical” it only adds administrative requirements for record keeping. It doesn’t change actual test or examination requirements.

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42	ISTE-4160	Revised	<p><b>Technical:</b> Add a new requirement to provide a basis if the PRA model is not updated to address added risk from a failure of a component that is not modeled. This is a documentation requirement which does not affect testing or examination requirements. Therefore, it is inconsequential from a safety benefit perspective.</p>
44	ISTE-5121	Subparagraphs (b) and (c) revised	<p><b>Correction:</b> Changed wording for the comprehensive test to reflect the change in flow rate which was first made to ISTB in the 2017 Edition, but the change in flow rate terms was inadvertently missed for ISTE in the 2017 Edition. This change corrects that error.</p>
44	ISTE-5122	Subparagraph (b) revised	<p><b>Correction:</b> Changed wording for the comprehensive test to reflect the change in flow rate which was first made to ISTB in the 2017 Edition, but the change in flow rate terms was inadvertently missed for ISTE in the 2017 Edition. This change corrects that error.</p>
45	ISTE-5220	Revised	<p><b>Administrative:</b> Simplified language to refer to ISTC for check valve testing rather than specific sections or Appendix II. The general reference to ISTC is more correct and covers all scenarios for check valve testing.</p>
46	ISTE-6110	Revised	<p><b>Clarification:</b> Added the word “testable” to clarify those attributes which are selected for monitoring. This change clarifies the original intent.</p>
47	ISTF-2000	Definition of <i>baseline test</i> added	<p><b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”</p>
47	ISTF-3100	(1) First paragraph revised (2) Subparagraph (d) deleted	<p><b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”</p> <p><b>Administrative:</b> Eliminated differentiation between positive displacement pumps and reciprocation pumps since both are positive displacement pumps. The deleted paragraph referenced the same paragraph that is also referenced in the remaining requirement for positive displacement pumps.</p>
48	Table ISTF-3000-1	Second column head revised	<p><b>Editorial:</b> No discernable change other than format.</p>
48	ISTF-3310	Revised in its entirety	<p><b>Clarification and Administrative:</b> ISTF-3310 was restructured to split requirement into two new subparagraphs ISTF-3311 and ISTF-331. These new subparagraphs clarify when a “baseline” test (previously designated as a “preservice” test) is required. The new language reflects the original intent of when a “preservice test” was required and is consistent with how the industry has implemented the previous editions of OM with respect to “preservice testing.” This clarification is part of the larger change of “preservice test” to “baseline test”</p>
49	Table ISTF-3510-1	Second column head revised	<p><b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”</p>
50	ISTF-5000	Revised	<p><b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”</p>
50	ISTF-5110	Title revised	<p><b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”</p>

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51	ISTF-5210	Title revised	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”
52	ISTF-5310	Title revised	<b>Administrative:</b> Part of the larger change from “preservice test” to “baseline test”
52	ISTF-6000	First paragraph added	<b>Clarification:</b> Added language to better differentiate when systematic error (ISTF-6300) can be used versus corrective action (ISTF-6200)
55	I-1200	First paragraph revised	<b>Correction:</b> Corrected reference to ASME PTC 25 by elimination mention of Mandatory Appendix I.
56	I-1320	Subparagraphs (a) and (c)(3) revised	<b>Administrative:</b> Change related to integration of Code Case OMN-25 into Mandatory Appendix I
56	I-1350	Subparagraph (a)(3) revised	<b>Administrative:</b> Change related to integration of Code Case OMN-25 into Mandatory Appendix I
58	I-3220	Revised	<b>Technical:</b> Removed the requirement to determine set-pressure when installed in the system and raising system pressure up to the setpoint. The requirement was simplified to just require set pressure testing within 6 months. This change was made to address difficulties in performing set pressure testing using the installed system pressure which have been subject of previous requests for alternatives. Although this is a technical change with respect to the use of the installed system, it does not change the requirement to perform set pressure testing.
65	II-4000	Subparagraph (b)(5) revised	<b>Editorial:</b> Revision to incorporate Errata from 2017 Edition (reference OM Record 16-424)
68	III-3500	Subparagraph (a) revised	<b>Clarification:</b> Added language to clarify the original intent that each valve in the group is required to be tested.
78	Division 1, Mandatory Appendix V	Deleted	<b>Administrative:</b> Part of the change which integrated the requirements from Mandatory Appendix V from the 2017 Edition into Subsection ISTB and deleted Appendix V

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