

# PUBLIC SUBMISSION

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American Society of Mechanical Engineers 2021 – 2022 Code Editions (previously 2021 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code)

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## General Comment

This is pertaining to Draft Rulemaking Language regarding I-1310(e), Class 1 Pressure Relief Valve Sample Expansion.

Consider revising to more concise wording and possibly split into two sentences to avoid confusion, specifically with the Owner-established acceptance criteria. An example is shown below.

(x) [Reserved] OM condition: Class 1 Pressure Relief Valve Sample Expansion. When implementing paragraph I-1320(c)(1) in Appendix I, “Inservice Testing of Pressure Relief Devices in Water-Cooled Reactor Nuclear Power Plants,” of the editions and addenda of the ASME OM Code, incorporated by reference in paragraph (a)(1)(iv) of this section, the requirement for sample expansion of Class 1 Pressure Relief Valves shall be implemented such that for each valve tested for which the as-found set-pressure (first test actuation) exceeds the plus/minus tolerance limit of the Owner-established design set-pressure acceptance criteria of paragraph I-1310(e), two additional valves shall be tested from the same valve group. If the Owner has not established design set-pressure acceptance criteria, then for each valve tested for which the as-found set-pressure (first test actuation) exceeds  $\pm 3$  percent of valve nameplate set-pressure, two additional valves shall be tested from the same valve group.