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Revised Industry Codes and Standards for Production and Utilization Facilities

Comment On: NRC-2025-0060-0002

Revised Industry Codes and Standards for Production and Utilization Facilities

Document: NRC-2025-0060-DRAFT-0003

Comment on FR Doc # 2025-10324

Submitter Information

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Organization: The Hartford Steam Boiler Inspection & Insurance Company

General Comment

Please see attached file.

Attachments

Public Comment to NRC-2025-0060 Final

The Hartford Steam Boiler Inspection & Insurance Company
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July 9, 2025

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Washington, DC 20555-0001

Subj: DOCKET NUMBER NRC-2025-0060 ON PETITION FOR RULEMAKING ON 10 CFR 50.55A

The Hartford Steam Boiler Inspection & Insurance Company (HSB) performs inspection service to American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) requirements as an accredited Authorized Inspection Agency (AIA). Specifically, HSB provides ASME nuclear inspection services to reactor designers, component manufacturers, constructors, and utilities. Staff members from HSB also participate extensive in ASME B&PV Code development.

The staff of HSB has reviewed the Nuclear Energy Institute's (NEI) petition for rulemaking (PRM) submitting proposed changes to 10 CFR 50.55a and requesting revision to Regulatory Guides (RG) 1.84 and 1.147. HSB agrees with NEI that updates are needed for the efficiency in the use of ASME B&PV Code Section III and simplification of regulatory processes. HSB has provided our organization's position on the proposed changes in the discussion below.

ASME Section III Code Cases for Endorsement

NEI has requested inclusion of the following ASME Section III, Division 1 Code Case to the draft revision of Regulatory Guide 1.84 "Design, Fabrication, and Materials Code Case Acceptability, ASME Section III." HSB has presented additional discussion below for each specific code case.

N-883, Rev. 0 Construction Prior to the Establishment of an Owner

HSB has actively participated in the ongoing collaboration between ASME and the NRC concerning this code case. Revision 1 of Code Case N-883 was approved in April 2025 and is scheduled for publication in the upcoming edition of the ASME Code. This revision introduces enhanced guidance on the implementation of the code case to ensure that components manufactured under its provisions will meet the expectations of the regulatory authority having jurisdiction. Revision 2 has been initiated and addresses some additional stakeholder concerns identified.

The updates in these revisions were developed in direct response to NRC staff concerns raised during the evaluation of Revision 0, particularly regarding owner responsibilities in the absence of an identified Owner's Code. In light of these improvements, HSB recommends the endorsement of Code Case N-883, Revision 1, in the next revision of Regulatory Guide 1.84, recognizing the value of the added implementation clarity for regulatory compliance. Additionally, HSB supports NEI's submission of topical report NEI 25-05 to ensure that clear regulatory guidance is given for the implementation of this code case by future applicants and licensees.

N-915, Rev. 0 Extension of Internal Audit and Supplier Audit Due Dates in Exigent Conditions

The COVID-19 pandemic create significant barriers to travel and access to facilities, which necessitated extension of internal and supplier audit due dates. While the national emergency associated with COVID-

19 has ended, future exigent conditions may restrict travel and/or prevent access to facilities. Additionally, the NRC staff has coordinated with the nuclear industry to develop appropriate controls for extending audit due dates through Electrical Power Research Institute (EPRI) guidance and review of licensee quality assurance program exceptions via safety evaluation reports. HSB strongly recommends accepting this code case for use in the next revision of RG 1.84, in the event of future exigent conditions.

N-916, Rev. 0 Remote Verification and Witness of Activities

The COVID-19 pandemic posed significant challenges to travel and facility access, necessitating the adoption of remote verification and witnessing of activities. Although the national emergency associated with COVID-19 has ended, future exigent circumstances may again limit travel or restrict access to critical facilities.

In response, the NRC staff collaborated with the nuclear industry to establish appropriate controls for remote verification. This was achieved through the development of guidance by the Electric Power Research Institute (EPRI) and the evaluation of licensee quality assurance program exceptions via safety evaluation reports.

Notably, HSB had proactively initiated a pilot program for remote inspections even before the onset of the pandemic. Lessons learned from this initiative informed the development of ASME and National Board code cases, as well as the ASME Mobile Unmanned Systems (MUS-1) guidance for remote inspections.

Since 2020, HSB has successfully implemented its internal remote inspection program, completing over 500 remote inspection and verification activities. Based on this experience and proven efficacy, HSB strongly recommends that the associated code case be accepted for inclusion in the next revision of Regulatory Guide 1.84, to ensure preparedness for any future access limitations.

HSB thanks the NRC staff for their review and consideration of the technical discussion presented in this letter during adjudication of PRM 2025-0060.

Very Respectfully,

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