

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 9, 2025

Dale Matthews, Chair BPV III Committee on Construction of Nuclear Facility Components

American Society of Mechanical Engineers Two Park Avenue New York, NY 10016-5990

SUBJECT: INFORMATION ON NONMANDATORY APPENDIX HBB-Y "GUIDELINES FOR DESIGN DATA NEEDS FOR NEW MATERIALS"

Dear Mr. Matthews

This letter is to inform you on the NRC staff's position related to Nonmandatory Appendix HBB-Y in Section III, Division 5 (III-5), Subsection HB, Subpart B (HBB) of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC).

During the public comment period of Draft Guide DG-1436, the NRC received comments from various stakeholders who expressed interest in the NRC staff endorsing HBB-Y. In response, the NRC staff reviewed the contents of HBB-Y and considered whether the Appendix would be appropriate for NRC endorsement. HBB-Y is a nonmandatory appendix which provides guidance on data package development for the qualification of materials not currently included in HBB of Section III, Division 5 of the ASME BPVC. It pertains to submittals to ASME code committees. The NRC cannot endorse qualification procedures as acceptable for submitting materials to and meeting requirements of a third-party entity.

Although HBB-Y is not part of the staff's endorsement of Section III-5, the NRC staff finds it provides useful guidance with respect to the adequacy of a data package for qualification of a material by the ASME Code committees for elevated temperature nuclear applications. The NRC staff finds the guidance in HBB-Y is generally comprehensive and the review of the data by the experts in the cognizant Code committees provides additional confidence to the NRC staff that the data is appropriate. The NRC staff actively participates in the development of the ASME Code consistent with Management Directive 6.5 "NRC Participation in the Development and use of Consensus Standards" (ML18073A164). The NRC staff has members and alternate members in multiple committees within the ASME. A designer may ballot these committees to acquire the committee's feedback on their proposed data package.

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The NRC staff members' comments or votes do not constitute an official NRC position, but the response from the various committees should help to identify any potential issues early in the material qualification process.

Please contact me at Christan.Araguas@nrc.gov or the staff point of contact with any questions.

Sincerely,

Chutian Agus Signed by Araguas, Christian on 09/09/25

Christian Araguas, NRC Standards Executive Office of Nuclear Regulatory Research

CC:

Kathryn Hyam, Director ASME Nuclear Codes and Standards

Adam Maslowski, Staff Secretary ASME Nuclear Codes and Standards

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Memo on ASME III-5 HBB-Y DATE September 9, 2025

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