



**RIC 2008
Dynamic Restraint (Snubber)
Examination & Testing: Pending
Regulatory Challenges**

Jack McHale, CPTB Branch Chief
Division of Component Integrity
Office of Nuclear Reactor Regulation
March 11, 2008



**Current State of Snubber Examination
& Testing per the ASME Code**

- ASME B&PV Code, Section XI, IWF-5000 (through 2005 addenda) contains requirements for visual examination and testing of snubbers
 - Contains a "pointer" to ASME/ANSI OM, Part 4
- ASME OM Code, Section ISTD (starting with 1990 edition) contains requirements for visual examination and testing of snubbers



**Current State of Snubber Examination
& Testing per the Regulations**

- 10 CFR 50.55a, "Codes and Standards," states that ASME B&PV Code Section XI provides inservice inspection requirements for snubbers, and that licensees may use ASME OM Subsection ISTD (1995 edition and later) in place of snubber requirements in Section XI, IWF-5200 (a) & (b) and IWF-5300 (a) & (b).
- While using ISTD, 50.55a requires that preservice and inservice exams be performed using VT-3 visual exam methods described in Section XI, IWA-2213



Current Licensee Practices for Snubber Examination & Testing

- Some programs controlled by Technical Specifications
- Most programs are controlled by licensee controlled document, such as Technical Requirements Manual (TRM)
- Often, TRM is based on Section XI, but requires relief from certain requirements
- Very few licensees are using OM-ISTD
- Some use ASME OM Code Case (OMN-13)



Current State of Snubber Examination & Testing

The bottom line.....

- No consistent approach
- A mix of codes and plant specific documents control snubber test programs
- Heavy reliance on relief from Code requirements
- Regulations provide less than clear direction

..... it's a bit of a mess!



Pending Challenge

- With 2006 Addenda to the Code, Section XI dropped references to snubber testing (Article IWF-5000 deleted)
- Snubber examination and testing requirements will then only be contained in ASME OM-ISTD
- 50.55a rulemaking to incorporate the 2006 and later ASME Codes by reference will need to reflect ASME OM-ISTD as the unique source for snubber examination and testing requirements



What is Needed to Meet this Challenge

- ASME OM Code changes are needed to pick up all Section XI snubber requirements
- To ensure a more consistent approach, 50.55a needs to be updated to replace ASME Section XI requirements with ASME OM-ISTD requirements
- Licensees need to adopt standard approach to snubber examination and testing based on OM-ISTD during future program updates

7



Summary

- Current regulations and practices have led to a variety of approaches to snubber examination & testing programs
- ASME Section XI coverage of snubber examination & testing deleted with 2006 Addenda
- Changes to ASME Section XI, the OM Code and 10CFR 50.55a are needed to ensure a more consistent approach going forward

8
