

November 12, 2004

ORGANIZATIONS: AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) AND  
THE NUCLEAR ENERGY INSTITUTE (NEI)

SUBJECT: SUMMARY OF OCTOBER 28, 2004 MEETING WITH THE PUBLIC,  
ASME, AND NEI TO DISCUSS THE CONSENSUS CODES AND  
STANDARDS PROCESS AND RELATED REQUIREMENTS OF  
10 CFR 50.55a

### Meeting Discussions

The NRC staff held a public meeting on October 28, 2004, with representatives from the ASME and the NEI to discuss ways to improve the consensus codes and standards process and simplify related regulatory requirements in 10 CFR 50.55a. The primary objectives of the meeting were:

- 1) To identify areas of the ASME Code, Section XI (ASME XI) that generate numerous licensee requests for relief from Code requirements, and
- 2) To discuss actions taken by the ASME Code Committee to review the limitations and modifications on use of Code editions and addenda included in 10 CFR 50.55a.

The discussions focused on identifying those ASME XI requirements for which numerous requests for relief have been submitted by licensees. By doing so, the ASME could revise those problematic Code requirements in order to reduce the number of relief requests in the future. The meeting participants discussed various options to alleviate any unnecessary burden associated with the relief request process, and to expedite licensees' use of ASME Code cases soon after they are published by the ASME. The ASME emphasized the need for NRC staff identification of concerns with emerging Code changes as early as possible in the consensus review process, and discussed Code Committee initiatives to promote resolution of staff concerns before approval of Code changes. The ASME presented ongoing and proposed actions being taken to resolve NRC modifications and limitations on ASME XI Code and Code Case provisions currently listed in 10 CFR 50.55a, including development of ASME positions on NRC's modifications and limitations with which the Code Committee does not agree.

The NEI presented a tabular data summary of relief requests approved by the NRC during Calendar Year 2003. The data base listed the number of relief requests associated with specific ASME XI and ASME III Code paragraphs and Code Cases, resulting in identification of Code requirements which have caused numerous licensee relief requests. The meeting participants discussed the need for further investigation by the NEI to identify and categorize the specific Code provisions causing multiple relief requests. The refined data base would then be used in a future meeting to explore the possibility of specific changes to Code requirements

for the purpose of reducing the number of licensee relief requests submitted for staff review. The NEI also suggested potential simplification of the text and format of the NRC limitations and modifications currently listed in 10 CFR 50.55a.

The NRC staff identified three ASME XI Code Cases (N-660-1, N-711, and N-716) which, as currently written, will not be approved by the staff. Comments on these proposed Code Cases are being developed based on multi-discipline reviews from the NRC's Offices of Nuclear Regulatory Research and Nuclear Reactor Regulation. The resulting NRC position on these proposed Code Cases will be forwarded to the ASME Code Committee as soon as possible. NEI expressed interest in reviewing the two cases which are based on risk-informed insights (N-660-1 and N-716) to determine whether the risk-informed approach used in these Code Cases is consistent with the way the industry recommends the application of risk-informed insights.

The meeting resulted in identification of actions, listed below, to be taken by ASME, NEI, and the NRC staff that will provide the basis for future meetings and discussions. The participants agreed that the discussions and resulting proposed actions will promote the continuing dialog necessary to produce increased efficiency and effectiveness of the codes and standards consensus process. Another meeting to continue this communication process is expected to convene early in 2005. A list of meeting attendees (Attachment 1), the slides presented by the ASME at the meeting (Attachment 2), and the relief request tables and 10 CFR 50.55a Information Package presented by the NEI (Attachments 3, 4, and 5) are attached.

#### Action Items

##### Actions by ASME:

1. ASME will continue efforts to review ASME XI and affected Code Cases, to determine whether 10 CFR 50.55a limitations and modifications can be resolved by changes to the Code or Code Cases.
2. For those 10 CFR 50.55a limitations and modifications with which the Code Committee does not agree, the Committee will meet to document a position which will be submitted in a letter to the NRC staff for further consideration.
3. ASME will attempt to issue Code Committee meeting agendas earlier, i.e., approximately 4 weeks prior to quarterly Code meetings, to allow the NRC staff the opportunity to develop timely consensus positions on emerging issues.

##### Actions by NEI:

1. NEI will review the approach used in ASME XI Code Cases N-660-1 and N-716 with respect to the application of risk-informed insights.
2. The tabulation of relief requests for Calendar Year 2003 developed by NEI (attached to this meeting summary) will be further refined to identify specific provisions of ASME XI which have caused repetitive requests for relief from Code requirements.

3. Investigate changes to the 10 CFR 50.55a process to permit implementation of Code Cases approved by ASME, but not yet incorporated into the federal regulations.

Actions by NRC:

1. Investigate possible simplification of 10 CFR 50.55a by relocating limitations on approved Code editions to another document, such as a regulatory guide, which could be incorporated in the regulations by reference.
2. Finalize an NRC staff position on ASME XI proposed Code Cases N-660-1, N-711, and N-716 for ASME consideration. (This action was completed shortly after the meeting date.)

Please direct any inquiries to Patrick Sekerak at 301-415-2623, or [pxs1@nrc.gov](mailto:pxs1@nrc.gov).

**/RA/**

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Attachments: 1. List of Attendees  
2. ASME Slides  
3. NEI Table of Relief Requests vs. ASME Code Sections  
4. NEI Table of Relief Requests Approved by NRC in CY2003  
5. NEI Information Package on 10 CFR 50.55a

cc w/atts: (See page 4)

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**Attachment 2 Accession No.: ML043210500**

**Attachment 3 Accession No.: ML043210503**

**Attachment 4 Accession No.: ML043210504**

**Attachment 5 Accession No.: ML043210515**

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PUBLIC MEETING WITH THE ASME AND THE NEI  
REGARDING CODES AND STANDARDS ISSUES

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October 28, 2004

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