

July 26, 2006

Mr. Kenneth R. Balkey, Vice President  
Nuclear Codes and Standards  
American Society of Mechanical Engineers  
Three Park Avenue  
New York, NY 10016-5990

Dear Mr. Balkey,

By letter dated June 10, 2006, you summarized the activities that have taken place for addressing ASME Boiler and Pressure Vessel Code (ASME Code), Section XI, inspection requirements for managing primary water stress corrosion cracking (PWSCC) in butt weld connections in reactor coolant pressure boundary piping. You indicated that a draft Code Case with proposed examination requirements for these welded connections has been developed, and a team is in place to address comments, to seek supporting technical information, and to bring recommendations forward to move the action through the consensus process. The Nuclear Regulatory Commission (NRC) staff appreciates this update on the progress of these activities to develop the improvements to the existing ASME Code inspection requirements which are needed for managing PWSCC.

Your June 10, 2006, letter also indicates that the Executive Committee of the ASME Subcommittee XI met on May 16, 2006, and reviewed developments related to NRC interest in discussing the role of the ASME Code in ensuring the integrity of pressure retaining components, including the aspect of ensuring leakage integrity. It was noted in your letter that the Nuclear Energy Institute (NEI) issued a white paper in May 2006 titled, "Treatment of Operational Leakage from ASME Class 2 and 3 Components." Given NRC's interest in the role of the ASME Code in ensuring pressure boundary integrity, including leakage integrity, and ASME's interest in reviewing the NEI white paper, the Executive Committee decided that it would be prudent to develop an ASME position paper on this topic. Cognizant ASME Subcommittee XI representatives volunteered to form a project team that will report to the Subcommittee XI Executive Committee. We would appreciate that as the project team progresses with the preparation of this white paper, senior NRC representatives to the ASME Codes and Standards groups be provided the opportunity to discuss the work of the team and provide their perspective, as appropriate.

Regarding the NEI white paper on operational leakage, the NRC staff has arranged a meeting with industry representatives through the NRC Licensing Action Task Force to discuss industry's concern that use of NRC guidance on operability determinations and functionality assessments may cause unnecessary plant shutdowns. The meeting will be held on August 16, 2006, in Rockville. This meeting will be a public meeting. The NRC staff is interested in providing guidance that will not lead to unnecessary plant shutdowns while ensuring that safety is maintained at plants experiencing operational leakage.

K. Balkey

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Please feel free to contact me regarding any questions you have on this matter.

Sincerely,

**/RA/**

John A. Grobe, Director  
Division of Component Integrity  
Office of Nuclear Reactor Regulation

cc: A. Marion, Senior Director of Engineering, Nuclear Energy Institute  
G. Park, Chairman, ASME Subcommittee on Nuclear Inservice Inspection  
J. Ling, Associate Executive Director, ASME Codes and Standards  
K. Ennis, Director, Nuclear Codes and Standards  
P. McCullough, V.P. Accreditation, Institute of Nuclear Power Operations  
G. L. Vine, Executive Director, Washington Representative, EPRI  
R. L. Dyle, Southern Company  
M. Robinson, Chair, MRP Issue Integration Group  
J. Gasser, Executive Chair of PWR Materials Management Program  
D. Modeen, Chief Nuclear Officer, Electric Power Research Institute

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G. Park, Chairman, ASME Subcommittee on Nuclear Inservice Inspection  
J. Ling, Associate Executive Director, ASME Codes and Standards  
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G. L. Vine, Executive Director, Washington Representative, EPRI  
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M. Robinson, Chair, MRP Issue Integration Group  
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D. Modeen, Chief Nuclear Officer, Electric Power Research Institute

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