

SUMMARY OF DISCUSSIONS/ACTION ITEMS  
August 22, 2014, NRC/ASME Management Meeting

PARTICIPANTS

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MEETING SUMMARY

- Opening Remarks – Michael Case, NRC Standards Executive, indicated that communication between the organizations is very important, and the NRC staff finds the periodic meetings with the American Society of Mechanical Engineers (ASME) to be very valuable in this regard. Mr. Case believes that the results show that cooperation

between the ASME and NRC has been instrumental in the development of ASME Code requirements to address emerging safety-related issues, and that incorporation of these requirements into 10 CFR 50.55a is the appropriate mechanism to ensure effective and consistent implementation. He noted the ASME transmitted a number of letters to the agency recently requesting that the staff consider approval of a number of ASME Code actions. Mr. Case believes that this is an effective communication strategy.

- 10 CFR 50.55a Rulemakings (Edition Rulemaking) – Daniel Doyle, Rulemaking Branch, Division of Policy and Rulemaking, Office of Nuclear Reactor Regulation, reported that the proposed rulemaking to incorporate by reference into 10 CFR 50.55a the 2009 Addenda, 2010 Edition, 2011 Addenda, 2012 Addenda, and 2013 Edition to the ASME Boiler and Pressure Vessel Code and the 2009 Edition, 2011 Addenda, and 2012 Edition to the ASME *Operation and Maintenance of Nuclear Power Plants*,“ is scheduled to be published for public comment in September 2014. Mr. Doyle noted that this rulemaking can’t be published until the regulatory guide rulemaking (see below) has been noticed in the *Federal Register* because of the restructuring of 10 CFR 50.55a that was required. He also noted that the Office of Federal Register (OFR) has discussed the possibility of limiting subparagraphs in the regulations to three levels. 10 CFR 50.55a currently goes to six levels so a restructuring of the regulation would be required if the OFR proceeds.
- 10 CFR 50.55a Rulemakings (Regulatory Guide Rulemaking) – Jennifer Tobin, Rulemaking Branch, Division of Policy and Rulemaking, Office of Nuclear Reactor Regulation, reported that the final rulemaking to incorporate by reference Regulatory Guide (RG) 1.84, Revision 36, “Design, Fabrication, and Materials Code Case Acceptability, ASME Section III,” RG 1.147, Revision 17, “Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1,” and RG 1.192, Revision 1, “Operation and Maintenance Code Case Acceptability, ASME OM Code,” is scheduled to be published in September/October 2014. The final rulemaking has been signed by the Director of the Office of Nuclear Reactor Regulation (NRR), and the final step is approval by the Office of Management and Budget (OMB) to publish in the *Federal Register*. OMB conducts reviews with respect to conformance with the Paperwork Reduction Act, and the OMB review is expected to be completed in late September/early October.

Ms. Tobin indicated that the NRC has also been working on the development of the proposed rule that would incorporate the next revisions of the regulatory guides (i.e., RG 1.84, Revision 37; RG 1.147, Revision 18; RG 1.192, Revision 2), and the NRC anticipates publishing that proposed rule and RGs for public comment in early 2015. It was noted during the discussion that RG 1.84 and RG 1.147 will address those Code Cases contained in Supplement 11 to the 2007 Edition through Supplement 10 to the 2010 Edition of the ASME BPV Code. It was also noted that the NRC has completed its review of Supplement 11 to the 2010 Edition through Supplement 2 to the 2013 Edition.

**ACTION ITEM: Gary Park, Chair, ASME Section XI, requested that the NRC consider expanding the scope of RGs 1.84 and 1.147 by adding those supplements subsequent to Supplement 10 to the 2010 Edition for which the NRC**

**has completed its review. In response to a question by the NRC staff regarding timing, the ASME/industry representatives indicated that they favored scope expansion if the delay in the publication of the proposed rulemaking was reasonable. [Assigned to W. Norris]**

- Feedback on Special NRC Rulemaking Session at ASME Code Meetings – Gary Park thanked the staff for providing an overview of the soon-to-be-published edition proposed rule (see Doyle above). The staff has held similar sessions in the past. These sessions have proved to be beneficial as feedback was received one year, for example, that resulted in a clarification to a proposed staff condition. Mr. Park indicated that the industry finds these overviews to be very helpful and hopes that the NRC will continue to support them. With respect to feedback, Mr. Park offered that it was difficult for the attendees to provide specific feedback regarding the staff's proposed conditions because the staff's slides did not provide any information specific to the proposed condition. The NRC rulemaking staff in attendance indicated that they would consider this feedback when preparing for future rulemaking overviews.
- Section III, Rewrite of Subsection NCA (General Requirements for Division 1 and 2) - Ralph Hill, Chair, Section III, informed NRC management of plans to rewrite Section III, Subsection NCA. Subsection NCA contains the ASME Code requirements on the: use of editions and Code Cases; Owner's responsibilities; and responsibility for quality assurance. Various subsections have some general requirements however. The intent of the rewrite would be to consolidate the general requirements. Mr. Hill indicated the need for staff involvement to ensure that potential impacts on regulatory processes are appropriately considered. Currently, not all parts of Section III are incorporated by reference into 10 CFR 50.55a. Thus, staff participation is needed to develop an acceptable product.

**ACTION ITEM: Kamal Manoly and Richard McIntyre, as members of the Section III standards committee, volunteered to monitor proposed changes to these Section III requirements, keep the NRC staff informed, and assure that the appropriate feedback was provided with respect to potential impacts on regulatory requirements.**

- Nuclear Energy Standards Coordination Cooperative (NESCC) – Carol Moyer, RES, coordinates NRC activities with respect to NESCC. The purpose of NESCC is to organize to the extent possible standards activities between the NRC, Department of Energy (DOE), National Institute of Standards and Technology, and the associated standards development organizations (SDOs). Mrs. Moyer indicated that the NRC considers the ASME to be a model organization with respect to the standards development process and interaction with the NRC. NESCC could be a strategic forum for addressing cross-cutting topics between SDOs, and participation by the ASME would be valuable, especially in imparting knowledge with respect to interaction, to other participants in NESCC. Mr. Case indicated that the NRC's approach to NESCC is changing. The approach is more project-based, similar to ASME's LLC and grants. This

approach will also better fit DOE's mission and make it more attractive for DOE to be a partner.

- Operational Plans – Operational plans are used by the ASME to prioritize and track actions developed by the various working groups and committees. Mr. Park indicated that Section XI is developing an update the Section XI operational plan which should be approved by Section XI during the November 2014 meetings. Mr. Hill indicated that Section III is currently prioritizing their action items. Gary Stevens and Carol Moyer, NRC staff, advised ASME that the NRC is in the process of revising its action item list, and the staff would review the updated ASME plans with respect to the NRC operational plan.

**ACTION ITEM: ASME will share the Section III and Section XI operational plans with the NRC when they have been updated in November 2014. [Assigned to Ralph Hill and Gary Park]**

**ACTION ITEM: NRC will share its priority action item list with ASME when the update is complete (target is end of September 2014). [Assigned to Carol Moyer]**

- NRC/ASME Letters – The NRC has written a number of letters over the years requesting that the ASME consider certain changes to the BPV Code. Some of the NRC letters were addressed by opening committee action items, and in some cases, the ASME responded by letter to the NRC. Also, the ASME has written several letters to the NRC to address concerns about the frequency of rulemakings or the use of the BPV Code in the regulations. A question was recently raised whether an issue in an older letter was addressed, and if so, whether the issue had been properly closed. Gary Stevens researched various databases and developed a table listing the various letters between the organizations.

**ACTION ITEM: It was agreed that both organizations would review the table for completeness, and there would be further discussions regarding maintenance of the list and protocol for addressing letters and closing issues. [Assigned to Gary Stevens and Gary Park]**

- Section III Code for 2025 – Ralph Hill summarized a recently initiated ASME effort to consider the format and content of the ASME Code. Historically, incremental changes have been made to the ASME Code in response to events. This future-looking effort is attempting to be proactive rather than reactive in order to better serve users of the ASME Code. Mr. Hill indicated that the NRC is a major stakeholder and as such the ASME would like the NRC to be a part of this effort. Michael Case, NRC Standards Executive, indicated that the NRC has a strategy group that should be informed of the ASME effort. Tom Boyce, Chief, Regulatory Guidance and Generic Issues Branch, RES/DE, volunteered to be a liaison for the staff in this regard. A question was raised whether there will be a regulatory session at the NRC's 2015 Regulatory Information Conference (RIC) as this would be a good topic for inclusion.

**ACTION ITEM: Michael Case will contact Michael Webber, Deputy Executive Director for Transformation, with respect to the ASME future-looking effort. Tom Boyce will determine whether a regulatory session is planned for the 2015 RIC and notify Ralph Hill.**

- Next 6-Month Scheduled NRC/ASME Communication – The next scheduled communication will be a telephone call on Wednesday, February 11, 2015, at 1:30 pm, Eastern time.