



December 2, 2015

Secretary
ATTN: Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments Concerning Proposed Rule 10 CFR 50, "*Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases*" (80FR56820, dated September 18, 2015, Docket ID NRC-2011-0088)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning Proposed Rule 10 CFR 50, "*Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases*," published in the *Federal Register* on September 18, 2015 (i.e., 80FR56820).

The NRC is proposing to amend its regulations to incorporate by reference seven recent editions and addenda to the American Society of Mechanical Engineers (ASME) codes for nuclear power plants and a standard for quality assurance. The NRC is also proposing to incorporate by reference four ASME code cases. This action is in accordance with the NRC's policy to periodically update the regulations to incorporate by reference new editions and addenda of the ASME codes and is intended to maintain the safety of nuclear power plants and to make NRC activities more effective and efficient.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this proposed rule and offers the attached comments for consideration by the NRC.

If you have any questions or require additional information, please contact Richard Gropp at (610) 765-5557.

Respectfully,

David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment

Comments Concerning Proposed Rule 10 CFR 50, "*Incorporation by Reference of American Society of Mechanical Engineers Codes and Code Cases*"

10 CFR 50.55a	Comments on Proposed Changes
§50.55a(a)	<p>Exelon believes that the proposed rule is overly restrictive considering the inherent past precedent with changes to the applicable regulations. Instead of fewer conditions as the American Society of Mechanical Engineers (ASME) makes changes to accommodate regulatory changes into the ASME Code, there are more conditions being imposed. Instead of leaving technical particulars, such as Nondestructive Examination (NDE) procedure parameter specifics to expert research and development and industry service organizations, with charters based on improving and adopting innovation to these processes, specific rules are being imposed so technically prescriptive that they could potentially stall technological evolution and the resulting improvements. Some of the changes being proposed for examination of Cast Austenitic Stainless Steel (CASS) add criteria that are not yet developed (i.e., imposing undeveloped performance criteria effective on January 1, 2020). Exelon believes that additional clarification and justification is warranted and further backfit analysis is worth consideration. With regard to conditions on ASME-approved Code Cases, industry and research organizations have well developed technical bases, developed under quality rules imposed by 10 CFR 50, that demonstrate that the conditions placed on the Code and Code Cases by this proposed rule are not merited. Further, conditioning these sound, reasonable, technically based, and consensus-approved ASME rules to the extent proposed in this rulemaking is not considered necessary.</p>
§50.55a(a)(1)	<p>Furthermore, Exelon believes that continuing to impose the numerous conditions added to ASME Code particulars, some from many years ago, to all of the latest editions and addenda being added to the proposed rule, indicates no recognition for the progress and improvements the ASME and industry has made over the years. Exelon believes that the NRC should perhaps challenge any uncertainty or any misunderstanding that created the conditioning in the first place through the years against where the ASME and industry has evolved to now. The proposed rule continues to keep the statement "<i>through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section</i>" that was in the prior ASME Code edition and addenda conditioning with no assessment of the condition needing to be imposed on the later editions and addenda being adopted. ASME has addressed many of these areas and advances in technology and operating experience has removed concerns associated with the original creation of these conditions. Continuation of this conditioning to subsequent ASME editions and addenda is not considered necessary in most cases. For example, advances in underwater welding technology and the operating experience with that warrant relaxing the prohibiting conditions associated with application of this welding technology. As a different case example, the long-standing 10-year old condition in 50.55a(b)(2)(xx)(B) to impose a Section XI 2002 Addenda NDE provision has over the years proven to be unfounded and has incentivized licensees to reduce design margin to avoid radiography on a new system weld in which radiography was not the original design requirement for the system welds. Conditions like these need to be eliminated. The conditions imposed by ASME Section XI are likely safer than the situation this condition achieves. In summary, Exelon believes that all of the conditions on ASME rules that are carried into the adoption of later editions and addenda need reconsideration for eliminating their applicability to the later ASME rules being adopted.</p>
§50.55a(a)(1)(iii)(D) - new	<p>Exelon recommends deleting the reference to Code Case N-824. Requiring use of Code Case N-824 will freeze NDE methods to 2011/2012 technology. The nuclear industry is striving to improve examination capability for cast austenitic piping welds and should be allowed to use the most current and technically appropriate methods available at the time of examination.</p> <p>Exelon believes that adding Code Case N-824 for the inspection of CASS piping welds in the body of 10 CFR 50.55a, with conditions that could essentially re-write the NDE technical prescription, might not be appropriate. This Code Case should not be included in applicable regulations (i.e., 10 CFR 50). Exelon believes that Code Case N-824 should be listed as an approved Code Case in Regulatory Guide 1.147, "<i>Inservice Inspection Code Case Acceptability</i>," without conditions that may restrict a better examination from being performed.</p>

10 CFR 50.55a	Comments on Proposed Changes
<i>§50.55a(b)(2)(viii)(I) - new</i>	<p>Exelon recommends deleting this condition. The ASME has provided adequate justification for performing the IWL-2512(b) evaluation every 10 years rather than the proposed 5-year interval. Not all plants have committed to NUREG-1802, Revision 2, <i>"Generic Aging Lessons Learned (GALL) Report,"</i> where the 5-year frequency is required.</p> <p>Exelon believes that the requirement to examine representative samples of exposed concrete lacks specificity in terms of the required extent and methods of examination. Section XI visual examinations of concrete are not on a sampling basis so there is no Section XI guidance. In addition, Exelon believes the effect of the requirement is not well described in terms of obtaining a surface condition conducive to examination. Cleaning of back fill or coatings from concrete surfaces will result in significant hardship to a licensee without a compensating improvement in quality or safety.</p>
§50.55a(b)(2)(ix)(H)	<p>Exelon recommends deleting this requirement. The condition provides little additional value and only leads to licensee confusion concerning adequate implementation. Section XI requires examination of bolted connections and 10 CFR 50.55a, Appendix J, verifies containment penetration leakage integrity. In practical implementation terms, a licensee is required to perform visual examinations of all disassembled penetration bolting each outage in order to maintain compliance. Any significant bolting degradation would be observed during the already required Section XI examinations because visual examination qualification is required to detect evidence of degradation.</p>
§50.55a(b)(2)(xvii)	<p>Exelon recommends deleting this condition. Section XI, IWA-4222(a)(2) already states that reconciliation cannot negate compliance with quality assurance requirements through a footnote. The footnote states: <i>"This provision does not negate the requirement to implement the Owner's QA Program, nor does it affect Owner commitments to regulatory and enforcement authorities."</i></p>
§50.55a(b)(2)(xxi)(A)	<p>Exelon recommends deleting this requirement. The ASME has removed the examination requirement based on industry performance to date. The revision eliminated the requirement to examine the inner radius of nozzles in Class 1 pressurizers and steam generators. In order to determine that this examination was not necessary, an integrity evaluation was completed for a wide range of nozzles and configurations in service. The results showed no problems in this area of the nozzles. The survey of operating plants showed that no flaws have been found in these regions in 30 years of reactor service.</p> <p>The continued requirement to perform these examinations adds hardship and personnel radiation exposure in order to support examinations from the outside surface. Visual examinations from the inside surface are often the only option to avoid limited examinations (ability to obtain essentially 100% coverage). These examinations can result in significant personnel radiation exposure, increased probability of loose parts, and in some cases significantly increased time at high plant risk conditions. For example, sites without reactor coolant loop isolation valves have to perform steam generator visual examination at lowered reactor vessel water inventory levels. This can take several additional hours at this increased risk condition. Exelon believes that when considering these operating conditions in conjunction with the component examination history and ASME Code change evaluations, the continued requirement for performing these examinations could actually be increasing plant risk rather than reducing plant risk.</p>

10 CFR 50.55a	Comments on Proposed Changes
§50.55a(b)(2)(xxv)	<p>The prohibition on the use of IWA-4340 was included in the final rule for the 2003 Addenda of Section XI (i.e., 69FR58804) on October 1, 2004. The reasons stated for the prohibition were:</p> <ul style="list-style-type: none"> • Multiple applications of a modification at a single location are not prohibited. • The possible exemption of pressure testing for certain modifications. • The lack of minimum examination frequency to validate predicted flaw growth rates. • IWA-4340 does not specify examination methods and qualification requirements by reference to existing code rules. • The lack of clarity regarding the acceptability of defect growth beyond the bounds of the modification. <p>In 2008, ASME formed a Task Group to address the NRC concerns with IWA-4340. That Task Group worked for three years to develop a Code revision, Record 05-700, to address these issues. That ASME Code revision was approved and published in the 2011 Addenda.</p> <p>IWA-4340 in the 2011 Addenda through the 2013 Edition, address all of the NRC concerns identified in the <i>Federal Register</i> notice, and some additional concerns identified by the NRC during Task Group meetings:</p> <ul style="list-style-type: none"> • IWA-4340(m) prohibits multiple applications of a modification at the same location. • IWA-4340(l) mandates a system pressure test for all modifications. • IWA-4340(g), (h), and (i) stipulate minimum examination frequencies and requires validation of the predicted flaw growth rates by examination for high energy systems. For moderate energy systems validation of flaw growth rates is required or an increased examination frequency is mandated. • IWA-4340(g) stipulates use of volumetric examination in accordance with Mandatory Appendix I, and clarifies that actual or projected flaw growth into material credited for structural integrity of the item is unacceptable. • Additionally, use of IWA-4340 is not permitted in Class 1 systems. <p>Since all of the concerns identified in the final rule (i.e., 69FR58804) have been addressed, Exelon believes it is inappropriate for the NRC to continue the prohibition of IWA-4340 and the NRC should review IWA-4340 in the 2011 Addenda through 2013 Edition and approve its use. Exelon also believes that If the NRC has additional concerns with IWA-4340, perhaps it should consider an additional rulemaking a period of public comment prior to promulgating a final rule.</p>

10 CFR 50.55a	Comments on Proposed Changes
§50.55a(b)(2)(xxx) – new	<p>The proposed wording could be interpreted to imply that the required <i>"full length examination of 100 percent of the tubing"</i> can only be performed <u>after</u> the new/replacement steam generators are installed in the plant. If this is the NRC's intent, it would prevent the more common industry practice of performing the Preservice Inspection (PSI) exam on new and/or replacement steam generators prior to installation. This is typically accomplished at the manufacturing facility prior to shipment or after receipt onsite, but prior to installation.</p> <p>The new proposed NRC condition is more restrictive than the current Industry Guideline EPRI SGMP, <i>"PWR Steam Generator Examination Guidelines"</i> (Revision 7) which states: <i>"The PSI shall be performed <u>after tube installation for replacement SGs</u> or after field hydrostatic tests for new plants, but in both cases, prior to initial power operation to provide a definitive baseline record against which future in-service inspections can be compared."</i></p> <p>The new proposed NRC condition is also <u>more restrictive than the proposed wording in Revision 8 of the EPRI Guideline</u> (still in draft) which states: <i>"The PSI shall be performed after tube installation and shop or field primary side hydrostatic testing for new or replacement SGs, but in both cases, prior to initial power operation to provide a definitive baseline record against which future inservice inspections can be compared. Consider when to perform the PSI examination with regards to vessel handling, shipping, storage, and installation."</i></p> <p>Exelon requests that the option and flexibility of continuing to perform the PSI exam after tube installation and shop hydro, but prior to plant installation for replacement and new construction steam generators be provided in the proposed addition of 50.55a(b)(2)(xxx). The exception would be that if a new or replacement steam generator has been potentially damaged during transportation, storage, rigging, or installation a second PSI exam is required to document and disposition any potential damage to the affected steam generator.</p>
§50.55a(b)(2)(xxxi) - new	Exelon is requesting further clarification regarding what paragraph of ASME Section XI is being conditioned here. It appears this is a prohibition to using IWA-4131.1(d) based upon the background in the <i>Federal Register</i> notice.
§50.55a(b)(2)(xxxiv) - new	Exelon recommends deleting this condition. This appears to be an issue that needs to be addressed through the ASME and to be issued as Errata, not a new regulatory condition on implementation of ASME Section XI.
§50.55a(b)(2)(xxxvii) - new	Exelon recommends deleting this condition. Requiring use of Code Case N-824 will freeze NDE methods to 2011/2012 technology. The nuclear industry is working to improve examination capability for cast austenitic piping welds and should be allowed to use the most current and technically appropriate methods available at them time of examination. In addition, the center frequency limits do not account for tolerances in center frequency. Search units have a nominal frequency spectrum that result in the actual center frequency being within a percentage of the designated frequency. For instance a 500 kHz nominal frequency search unit could have a center frequency of 498 kHz. This condition clearly meets the required performance needed, but would not meet literal wording of the proposed rule.
§50.55a(b)(2)(xxxvii)(A) - new	See comment for §50.55a(b)(2)(xxxvii).
§50.55a(b)(2)(xxxvii)(B) - new	See comment for §50.55a(b)(2)(xxxvii).
§50.55a(b)(2)(xxxvii)(C) - new	See comment for §50.55a(b)(2)(xxxvii).
§50.55a(b)(2)(xxxvii)(D) - new	See comment for §50.55a(b)(2)(xxxvii).
§50.55a(b)(2)(xxxvii)(E) - new	See comment for §50.55a(b)(2)(xxxvii).

10 CFR 50.55a	Comments on Proposed Changes
§50.55a(b)(3)(ii)	<p>This requires implementation of Mandatory Appendix III for Motor Operated Valve (MOV) Inservice Testing (IST).</p> <p>This change effectively codifies existing NRC Generic Letter (GL) 96-05 requirements. This change is expected to add additional IST active MOVs into the MOV Diagnostic Test Program depending on the plant. This change will result in less flexibility with waiving as-found MOV IST diagnostic testing since MOV diagnostic testing becomes the de facto MOV IST surveillance test of record. While this change will introduce additional burden, it is expected as part of testing and is not a change from that approved under ASME OM Appendix III.</p>
§50.55a(b)(3)(ii)(A) - new	<p>Most plants under their existing GL 96-05 MOV programs have already justifiably extended MOV IST intervals out beyond 5 years, many as far as 10 years (the maximum interval approved by Appendix III). This extension is supported by existing GL 96-05 MOV programs. The requirement to reevaluate all valves within 5 years of Appendix III implementation will pose additional Appendix III burden, since many of these valves will not be due for another test for up to 5 years beyond the 5-year due date stipulated by the NRC provision.</p>
§50.55a(b)(3)(ii)(C) - new	<p>Exelon believes that it prudent to confirm that the 3-Tier MOV Risk Rankings (High, Medium, and Low) established by the Joint Owners' Group (JOG) MOV Periodic Verification (PV) program are considered acceptable, since they were previously approved by the NRC.</p>
§50.55a(b)(3)(ii)(D) - new	<p>Exelon's understanding is that the NRC had previously agreed with ASME to eliminate stroke time testing as a benefit and incentive to adopt Optional Code Case OMN-1. In keeping with OMN-1, stroke time testing is currently eliminated from OM Mandatory Appendix III. This change is unexpected and will introduce additional implementation burden for those plants which have proactively adopted Code Case OMN-1.</p>
§50.55a(b)(3)(xi) - new	<p>The NRC has added a new condition that valve position verification also includes verification of valve obturator movement (i.e., disc) at least every 2 years (the exceptions to previous "where practical"). The NRC states that this was always the intent even though the Code had allowed stem movement verification to be adequate in most instances. This change is considered to be highly impactful to the industry from a cost and resource perspective since no direct means are available to verify disc movement without system flow operation. The NRC apparently is concerned about undetected valve stem disc separations even though industry failure data shows that such failures make up a tiny fraction of all valve failures.</p> <p>Exelon believes that the impact of the valve obturator position verification is overly burdensome and costly. This testing would likely require special system operational testing that increases Operator burden and risk to plants. Exelon does not believe that this testing would provide any measureable benefit to improving on-demand reliability of Power Operated Valves (POVs) (including AOVs, MOVs, etc.), nor does Exelon consider that it significantly improves the ability to predict stem/disc separations before actual failure. This additional testing might be considered as a backfit and further clarification might be beneficial, which perhaps should include appropriate justification using a rigorous cost benefit analysis.</p>
§50.55a(f)(4)	<p>Exelon believes that the removal of Class 1, Class 2, and Class 3 from 10 CFR 50.55a(f)(4) will force licensees to expand the scope of IST components that are not designed to mitigate the consequences of an accident as described in the design basis accident section (i.e., Chapter 15 of a station's Updated Final Safety Analysis Report).</p> <p>The impact could be significant based on the fact that components that are permanently installed at stations will have to perform a substantial amount of modifications and dedicate these components without any additional safety benefits.</p>

10 CFR 50.55a	Comments on Proposed Changes
§50.55a(g)(1)	<p>This requirement has been in place for many years. Recently, the NRC is demonstrating they are interpreting the requirements differently than had been accepted in the approximate previous 30 years. Many Boiling Water Reactor (BWR) plants and some Pressurized Water Reactor (PWR) plants have used the guidance/precedent of 10 CFR 50.55a(c)(2)(i) for defining Class 1 components under the Section XI owner responsibility of IWA-1400. In addition, Regulatory Guide 1.26 has been used as a guide by all plants for classifying Class 2 and 3 components. Regional Inspector input has indicated that 10 CFR 50.55a(c)(2)(i) may not be used as guidance for determining ISI Class 1 components. A recent non-cited violation (i.e., reference ML15218A371) indicates that the NRC may be taking a position that all safety-related pressure vessels, piping, pumps and valves, and their supports are required to be classified as Class 2 or 3 regardless of function or classification guidance provided in Regulatory Guide 1.26. The perceived positions described above would result in older plants being required to include systems and segments of systems in the Section XI ISI program that are not required for newer plants and would essentially negate use of the licensing basis as a tool for classifying components as required by IWA-1400.</p> <p>Exelon suggests the following wording change as provided below for clarification:</p> <p><i>Inservice inspection requirements for older plants (pre-1971 CPs).</i> For a boiling or pressurized water-cooled nuclear power facility whose construction permit was issued before January 1, 1971, components (including supports) must meet the requirements of paragraphs (g)(4) and (g)(5) of this section to the extent practical. Components that are part of the reactor coolant pressure boundary and their supports must meet the requirements applicable to components that are classified as ASME Code Class 1. 10 CFR 50.2 or 10 CFR 50.55a(c)(2) may be used for defining Section XI Class 1 components. Other safety-related pressure vessels, piping, pumps and valves, and their supports Classified as Class 2 or Class 3 in accordance with the plant licensing basis and IWA-1400 must meet the requirements applicable to components that are classified as ASME Code Class 2 or Class 3.</p>
§50.55a(g)(2)(i) - new	<p>Exelon recommends not changing the existing 10 CFR 50.55a(g)(2) or consider further evaluation and discussion of the proposed change as a possible backfit, since there appears to be a change in intent by using the term "<i>to perform</i>" in lieu of "<i>enable the performance</i>." Ultrasonic examination techniques have changed radically since these plants were licensed. Most pipe/piping to valve welds can only be examined from one side; therefore, examination limitations exist. The examinations from one side were credited essentially 100% coverage in the early life of plants based on requirements and processes at the time. The current state of NDE processes and current qualification requirements do not allow credit for essentially 100% coverage. The new wording appears to require a redesign of these configurations when replacing existing components. This would require significant design changes and many spare parts could become unusable in order to maintain regulatory compliance. Conforming spare parts have long lead times for delivery. Non-conformance would require a licensee to request relief from the design requirements adding an additional burden on both the licensee and the NRC without any increase in plant safety. If the intent of the NRC is to require licensees to change existing configurations being replaced with new designs that allow 100% coverage, then Exelon would consider this is a significant change and believes that further backfit analysis might be prudent.</p>
§50.55a(g)(2)(ii) - new	See comment for proposed 50.55a(g)(2)(i).
§50.55a(g)(2)(iii) - new	See comment for proposed 50.55a(g)(2)(i).
§50.55a(g)(4)(i)	<p>The NRC work management schedule for relief requests is based on a 12-month review from time of licensee submittal to time of NRC approval. Most licensees require relief requests to be approved at the start of the interval. Licensees may not know the applicable Code of applicability until 12 months prior to the start of the interval based on current and proposed wording. Exelon suggests changing 12 months in this regulation to 18 or 24 months in order to allow a licensee to develop any required relief requests and allow NRC review on non-expedited basis.</p>

10 CFR 50.55a	Comments on Proposed Changes
§50.55a(g)(4)(ii)	The NRC work management schedule for relief requests is based on a 12-month review from time of licensee submittal to time of NRC approval. Most licensees require relief requests to be approved at the start of subsequent intervals. Licensees may not know the applicable Code of applicability for subsequent intervals until 12 months prior to the start of the interval based on current and proposed wording. Exelon suggests changing 12 months prior to the start of the interval in this regulation to 18 or 24 months in order to allow a licensee to develop any required relief requests and allow NRC review on non-expedited basis.
§50.55a(g)(6)(ii)(D)(3)	Exelon believes that the new 50.55a(g)(6)(ii)(D)(3) condition on N-729-4 will approximately double the number of Reactor Vessel (RV) head bare metal visual examinations on "cold heads" affecting about 20 plants. None of these "cold heads" have ever experienced a leak (as stated in the new regulation write-up) and sound technical basis supports the Code Case rules as being safe without conditions. However, the proposed rule states: <i>"this increasing trend creates a reasonable safety concern."</i> Furthermore, the added condition only relaxes to once every 5 years if the licensee performs a wetted surface exam of all of the partial penetration welds. This position is not supported by safety evaluations. It is also most probable no licensees will elect to perform such surface exams as they are proven to yield false indications and would be required to be performed with more restrictive acceptance criteria than the original construction Code prescribed.
§50.55a(g)(6)(ii)(D)(4)	Exelon believes that the new 10 CFR50.55a(g)(6)(ii)(D)(4) condition appears to be taking an ASME interpretation out of context and is certainly not necessary in recognition that all plants have a Corrective Action Program (CAP) to address such conditions. Exelon believes that the appropriate process to disposition this NRC issue with the ASME interpretation language is through ASME and not necessarily within this rulemaking effort.
§50.55a(g)(6)(ii)(F)(1)	<p>Exelon believes that it is impractical for a licensee to meet the implementation requirement for revised Code Cases if the rule imposes a short time period prior to or during a refueling outage. Exelon suggests changing the rule language from <i>"the effective date of the final rule"</i> to <i>"six months following the effective date of the final rule."</i></p> <p>The latest ASME approved revision of N-770 is N-770-4. Exelon recommends that the NRC consider the adoption of this revision into the rulemaking.</p>
§50.55a(g)(6)(ii)(F)(2)	Exelon believes that the last sentence of the proposed rule involves including additional scope. Paragraph-1100(e) is unchanged from N770-1 to N-770-2, so this is a new requirement and further potential backfit analysis should be considered.
§50.55a(g)(6)(ii)(F)(11) - new	<p>Exelon believes that this requirement is currently untenable and will require licensees to submit relief requests if qualification efforts are not successful. Exelon recommends deleting the proposed condition until examination techniques meeting the requirements are available.</p> <p>The new 10 CFR 50.55a(g)(6)(ii)(F)(11) condition imposes future ASME rules that are currently under development (by January 1, 2020). To impose criteria that are being developed by other organizations that will not be completed for essentially 4 years from now as a condition to a Code Case is unprecedented. Exelon believes that the <i>Backfitting and Issue Finality</i> section of the proposed rulemaking inappropriately addresses this condition as necessary for nickel-alloy inspections, when the actual topic of the condition is Cast Stainless Steel.</p>

10 CFR 50.55a	Comments on Proposed Changes
<i>§50.55a(g)(6)(ii)(F)(13) - new</i>	<p>Exelon believes that this new condition should be further evaluated for potential for backfit analysis. The industry has already instituted requirements for use of encoded examination techniques, but on a less frequent basis. The requirement does not allow for manual scanning for configurations that are not conducive to obtaining encoded data for essentially 100% of the inspection surface area.</p> <p>Personnel and procedures are qualified to the same flaw detection and sizing requirements. Adding this new requirement will not significantly increase safety, but will increase administrative burden through the need for more relief requests.</p> <p>Exelon believes that the new 10 CFR 50.55a(g)(6)(ii)(F)(13) condition imposes new requirements that require encoded examinations where ASME rules do not require encoded examinations. Two human factors issues are cited as the basis for requiring encoding of ultrasonic examination of these items. No encoding is required nor prohibited by ASME examination rules in Code Case N-770-2 examinations. Industry issue program initiatives (i.e., NEI 03-08) have already addressed the human factor issues cited. Imposing encoding to the extent proposed in this condition is considered unnecessary.</p>