

Enclosure: NRC Response to ASME Recommendation

NRC Document	ASME Discussion	ASME Recommendation	NRC Response
<p>Regulatory Guide 1.7, Control of Combustible Gas Concentrations in Containment</p> <p>Rev. 3, March 2007</p>	<p>Regulatory Position 5 describes methods acceptable to the NRC for demonstrating structural integrity of steel and concrete containments. This regulatory position specifically references the ASME Boiler and Pressure Vessel Code, Section III, Divisions 1 and 2.</p> <p>For steel containments, the applicable ASME Code Edition and Addenda are “as incorporated by reference in 10 CFR 50.55a(b)(1)”. However, because ASME Code, Section III, Division 2 has not been incorporated by reference in 10 CFR 50.55a(b), compliance with Regulatory Guide 1.7, Regulatory Position 5.2 would require use of that edition and addenda of Division 2 listed in Regulatory Guide 1.7, Reference 24 (1992 Edition). As a result, compliance with Regulatory Position 5.2 must be demonstrated in accordance with Subarticle CC-3720 of the 1992 Edition of Section III, Division 2, unless an alternative is submitted and approved by the regulator.</p>	<p>ASME offers the following specific recommendations to address this issue:</p> <ul style="list-style-type: none"> a. Initiate rulemaking to incorporate by reference into 10 CFR 50.55a the ASME Code, Section III, Division 2, then take action to revise R.G. 1.7, Position 5.2 to allow the use of editions and addenda as incorporated by reference in 10 CFR 50.55a(b). b. Alternatively, the NRC should revise Regulatory Guide 1.7 to reference a later edition and addenda of ASME Code, Section III, Division 2 in Reference 24. 	<p>Although your letter recommended rulemaking or a revision to this Regulatory Guide (RG), there was no safety issue discussed in the ASME letter. Given that rulemaking or regulatory guide revisions require significant staff resources, such revisions must be supported mainly by the safety issue.</p> <ul style="list-style-type: none"> a. Letter (ML14233A093) from Mark Satorius, NRC EDO, to Ralph Hill, ASME VP Nuclear Codes and Standards Stated: “With respect to your request to amend 10 CFR 50.55a, to be accepted and considered by the NRC, a petition for rulemaking (PRM) must meet the criteria in 10 CFR 2.802. The NRC has carefully reviewed your request and has concluded that the information you provided does not meet the Commission’s criteria for a PRM under 10 CFR 2.802(c).” b. During a phone call between Ralph Hill and Kamal Manoly, NRC, the benefits of a rule to incorporate by reference (IBR) Section III, Division 2 versus using NRC regulatory guidance to “endorse” Division 2 were discussed. The NRC staff pointed out that endorsement by IBR in the regulations might be too constraining based on the future needs of industry, and that the NRC could examine the possibility of updating RG 1.7 and other related design RGs with the current revision of Section III, Division 2. RG 1.7, is due for a 5-year assessment in August 2018. At this time the NRC staff will assess if the RG should be revised to endorse the current version of Section III, Division 2.

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<p>Regulatory Guide 1.8, Qualification and Training of Personnel for Nuclear Power Plants</p> <p>Rev. 3, May 2000</p>	<p>This Regulatory Guide endorses, in part, ANSI/ASME NQA-1-1983, Quality Assurance Program Requirements for Nuclear Power Plants. Regulatory Positions C.2.1.2, C.2.11, and C.2.12 specifically address ANSI/ASME NQA-1-1983.</p>	<p>Because NQA-1–2012 has been published, ASME requests that the NRC revise Regulatory Guide 1.8 to endorse ASME NQA-1–2012, or later editions and addenda of this standard.</p>	<p>RG 1.8 is in the process of being revised. It is anticipated that the draft guide will soon be issued for public comment. The 2000 version of RG references the 1983 version of ANSI/ASME NQA-1. The draft RG 1.8 issued for public comment may or may not reference a specific version of ANSI/ASME NQA-1. The ASME may provide comment on the draft RG 1.8 when issued for public comment.</p> <p>A related RG, RG 1.28, endorses NQA-1-2008 and the NQA-1a-2009 Addenda, “Quality Assurance Requirements for Nuclear Facility Applications. On June 19, 2015, the NRC issued the results of a periodic review of Regulatory Guide (RG) 1.28 that may be viewed at http://pbadupws.nrc.gov/docs/ML1516/ML15168A145.pdf. The review stated: “The NRC staff performed a review and identified that differences exist between the previously endorsed American Society of Mechanical Engineers (ASME) standards (Nuclear Quality Assurance (NQA)-1-2008, “Quality Assurance Requirements for Nuclear Facility Applications” and NQA-1a-2009 addenda, “Addenda A to Quality Assurance Requirements for Nuclear Facility Applications”) and the most recently issued standards from ASME (NQA-1b-2011 “Addenda B to Quality Assurance Requirements for Nuclear Facility Applications”, NQA-1-2012 and NQA-1-2015). The NRC will publish a report on this evaluation, including a determination of the future need to revise RG 1.28, in approximately two years’ time.”</p> <p>Based on the above, licensees may be able to justify use of the later versions of ANSI/ASME NQA-1 listed in RG 1.28, with any imposed conditions.</p>
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<p>Regulatory Guide 1.28, Quality Assurance Program Criteria (Design and Construction)</p> <p>Rev. 4, June 2010</p>	<p>This regulatory guide endorses Part I and Part II requirements of NQA-1-2008 and the NQA-1a-2009 Addenda, with additions and modifications.</p>	<p>Because NQA-1–2012 has been published, ASME requests that the NRC revise Regulatory Guide 1.28 to endorse ASME NQA-1–2012, or later editions and addenda of this standard.</p>	<p>The NRC staff has examined the 2010 and 2015 versions of the ASME NOG-1 and concluded that the changes, when compared to the 2004 version, may justify an update to Section 9.1.5 of NUREG-0800. The NRC will consider referencing the newest version of ASME NOG-1 the next time Section 9.1.5 is up for an update. Although NRC endorsement would facilitate use of the standard in regulatory processes, it is not essential for use. Licensees and license applicants may propose use of the newer versions of ASME NOG-1 in licensing submittals that they make.</p>
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<p>Regulatory Guide 1.35, Inservice Inspection of Ungrouted Tendons in Prestressed Concrete Containments</p> <p>Rev. 3, July 1990</p>	<p>This regulatory guide describes a basis acceptable to the NRC staff for developing an appropriate inservice inspection and surveillance program for ungrouted tendons in prestressed concrete containment structures of light water-cooled reactors. ASME notes that some of the regulatory positions in this guide are now in conflict with, and are more restrictive than, requirements specified in the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, as amended by conditions listed in 10 CFR50.55a(b)(2)(viii). Examples of this are as follows:</p> <p>a. Regulatory Position C.6 does not list standards or methods now listed in the ASME Code, Section XI, Subsection IWL that may be used for inspection of tendon sheathing filler grease. Footnote 5 specifically references the ASME Boiler and Pressure Vessel Code, Section III, Division 2, 1982 Winter Addenda.</p> <p>b. Regulatory Position C.7.4.f specifies that if the amount of grease replaced exceeds 5% of the net duct volume, this condition is reportable to the NRC in accordance with Regulatory Position C.8. The ASME Code, Section XI, Subsection IWL, 2007 Edition with the 2008 Addenda specifies 10% as the criteria for grease installation and does not mandate that grease is to be installed at the original installation</p>	<p>Because 10 CFR 50.55a requires all licensees to comply with IWL requirements, ASME believes that there is no longer a need for this guidance and requests the NRC to withdraw this regulatory guide. Alternatively, the NRC should revise this regulatory guide to eliminate information that is in conflict with Editions and Addenda of the ASME Code, Section XI, Subsection IWL incorporated by reference in 10 CFR 50.55a.</p>	<p>The NRC staff agreed with your assessment that the ASME Code in 10 CFR 50.55a contains adequate requirements. As a result, RG 1.35 was withdrawn in August of 2015 because of changes in NRC regulations that rendered it obsolete (reference 80 FR 52067). The withdrawal does not affect the licensing bases of current licensees approved to use RG 1.35. The basis for the staff's withdrawal is available on the NRC's web site at: http://pbadupws.nrc.gov/docs/ML1504/ML15040A665.pdf.</p>
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	pressure. ASME believes that adequate requirements for inservice inspection and surveillance program for ungrouted tendons in pre-stressed concrete containment structures are now specified in the ASME Code, Section XI, Subsection IWL.		
Regulatory Guide 1.35.1, Determining Prestressing Forces for Inspection of Prestressed Concrete Containments Rev. 0, July 1990	This regulatory guide provides additional guidance on measurement of prestressing forces, determining prestressing losses, grouping of tendons for inspection and testing, and construction of tolerance bands for prestressing forces in tendon groups. Regulatory Position C.1 provides guidance on measuring tendon prestressing force and indicates that "Code Section CC-4464 (Ref. 1)1 should be followed...", as supplemented by addition guidance listed in Regulatory Position C.1. CC-4464 requires that measured elongation exceeding +/-5% of that predicted by calculations shall be resolved, and Regulatory Position C.1.2 indicates that this condition should be evaluated and corrective actions identified if this tolerance is exceeded.	ASME requests the NRC to revise this regulatory guide to address the following: <ul style="list-style-type: none"> a. ASME Code, Section XI, Subsection IWL (Edition and Addenda incorporated by reference in 10 CFR 50.55a) specifies an acceptance standard of +/- 10% for elongation measurement, so ASME recommends that Regulatory Guide 1.35.1 be revised to eliminate the conflict in criteria for tendon elongation measurements between this regulatory guide and ASME Section XI, Subsection IWL. b. Alternatively, the NRC should revise this regulatory guide to clarify that the +/-5% acceptance standard for elongation measurement applies only to measurements taken during construction, prior to commercial operation of the plant. 	A staff review of RG 1.35.1 in 2015 determined that it was acceptable for continued use, and no revisions were needed at this time. However, because several references, including standards, in the RG have been updated, future evaluations of this RG will need to determine if the revised references provide an acceptable method to satisfy the regulatory requirements for determining pre-stressing forces for pre-stressed concrete containments. The staff's review can be found on the NRC's web site at: http://www.nrc.gov/reading-rm/doc-collections/reg-guides/power-reactors/rg/division-1/division-1-21.html .

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<p>Regulatory Guide 1.52, Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants</p> <p>Rev. 4, September 2012</p>	<p>This regulatory guide endorses the following ASME Nuclear Codes and Standards, with supplemental requirements:</p> <ul style="list-style-type: none"> • ASME N509-2002, Nuclear Power Plant Air-Cleaning Units and Components Reaffirmed 2008 • ASME N510-2007, Testing of Nuclear Air-Treatment Systems • ASME AG-1-2009, Code on Nuclear Air and Gas Treatment, with 2010 Addendum 1a and the 2011 Addendum 1b • ASME N511-2007, In-Service Testing of Nuclear Air Treatment, Heating, Ventilating, and Air-Conditioning Systems • ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications 	<p>ASME requests that the NRC revise Regulatory Guide 1.52 to endorse the following editions and addenda of the referenced codes and standards, or later editions and addenda of these standards:</p> <ul style="list-style-type: none"> • ASME AG-1-2014, Code on Nuclear Air and Gas Treatment (ASME N510 is now Superseded by this code) • ASME NQA-1-2012, Quality Assurance Requirements for Nuclear Facility Applications 	<p>Although your letter recommended rulemaking or a revision to this RG, there was no safety issue discussed in the letter. Given that rulemaking or regulatory guide revisions require significant staff resources, such revisions must be supported mainly by the safety issue. This RG is scheduled to undergo a periodic staff review in Q1 of FY 2018.</p>
<p>Regulatory Guide 1.90, Inservice Inspection of Prestressed Concrete Containment Structures with Grouted Tendons</p> <p>Rev. 2, November 2012</p>	<p>This regulatory guide references ASME Boiler and Pressure Vessel Code, Section III, Division 2, Code for Concrete Reactor Vessels and Containments, 2001 Edition through the 2003 Addenda.</p>	<p>ASME recommends that the NRC revise this regulatory guide to reference the 2013 Edition of Section III, Division 2, or later editions and addenda of this code</p>	<p>Although your letter recommended rulemaking or a revision to this RG, there was no safety issue discussed in the letter. Given that rulemaking or regulatory guide revisions require significant staff resources, such revisions must be supported mainly by the safety issue. This RG is scheduled to undergo a periodic staff review in Q1 of FY 2018.</p>

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<p>Regulatory Guide 1.100, Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants</p> <p>Rev. 3, September 2009</p>	<p>This regulatory guide references ASME QME-1-2007, Qualification of Active Mechanical Equipment Used in Nuclear Power Plants.</p>	<p>ASME recommends that the NRC revise this regulatory guide to reference ASME QME-1-2012, or later editions and addenda of this standard.</p>	<p>A staff review of this RG in December 2014 determined that it is acceptable for continued use. RG 1.100 uses two industry standards, namely IEEE 344 "Recommended Practice for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations," 2004 edition, and ASME QME-1-2007, "Qualification of Active Mechanical Equipment Used in Nuclear Facilities." There were minor revisions of the standards subsequent to Revision 3 of the RG, but the changes were not deemed significant enough to warrant revising RG 1.100 at this time. The staff's review can be found on the NRC's web site at: http://www.nrc.gov/reading-rm/doc-collections/reg-guides/power-reactors/rg/division-1/division-1-81.html.</p>
<p>Regulatory Guide 1.107, Qualification for Cement Grouting for Prestressing Tendons in Containment Structures</p> <p>Rev. 2, June 2011</p>	<p>This regulatory guide references ASME Boiler and Pressure Vessel Code, Section III, Division 2, Code for Concrete Reactor Vessels and Containments, 2001 Edition through the 2003 Addenda.</p>	<p>ASME recommends that the NRC revise this regulatory guide to reference the 2013 Edition of Section III, Division 2, or later editions and addenda of this code. In addition, ASME recommends that the NRC consider revising the references section of this guide to correct a number of the footnote references, which appear to be incorrectly numbered.</p>	<p>Although your letter recommended rulemaking or a revision to this RG, there was no safety issue discussed in the letter. Given that rulemaking or regulatory guide revisions require significant staff resources, such revisions must be supported mainly by the safety issue. This RG is scheduled to undergo a periodic staff review in Q3 of FY 2016.</p>

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<p>Regulatory Guide 1.136, Design Limits, Loading Combinations, Materials, Construction, and Testing of Concrete Containments</p> <p>Rev. 3, March 2007</p>	<p>This regulatory guide endorses the following ASME Nuclear Codes and Standards, with supplemental requirements:</p> <ul style="list-style-type: none"> ASME Boiler & Pressure Vessel Code, Section III, Rules for Construction of Nuclear Facility Components, Division 2, Code for Concrete Containments, 2001 Edition with 2003 Addenda ASME Boiler & Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components, 2001 Edition with 2003 Addenda 	<p>ASME requests that the NRC revise this regulatory guide to reference the 2013 Edition of Section III, Division 2, or later editions and addenda of these codes. In addition, the NRC should revise this regulatory guide to remove reference to the specific edition and addenda of Section XI, and refer the reader to 10 CFR 50.55a which specifies Section XI editions and addenda required for use by licensees, subject to applicable conditions imposed by 10 CFR 50.55a(b)(2). The NRC should also take similar action to remove reference to the specific edition and addenda of Section III, Division 2, if Section III, Division 2 is incorporated by reference into 10 CFR 50.55a (See comments provided for Regulatory Guide 1.7).</p>	<p>Although your letter recommended rulemaking or a revision to this RG, there was no safety issue discussed in the letter. Based on the results of a review in October 2015, the staff concluded that a revision to RG 1.136 Rev. 3 is warranted. The staff intends to review for possible endorsement the 2013 Edition of the ASME B&PV Code. A draft of this revision is tentatively planned for release for public comment in Q1 of FY 2017. The staff's review can be found on the NRC's web site at: http://www.nrc.gov/reading-rm/doc-collections/reg-guides/power-reactors/rg/division-1/division-1-121.html.</p>
<p>Regulatory Guide 1.140, Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants</p> <p>Rev. 2, June 2001</p>	<p>This regulatory guide endorses the following ASME Nuclear Codes and Standards, with supplemental requirements:</p> <ul style="list-style-type: none"> ASME N509-1989, Nuclear Power Plant Air-Cleaning Units and Components Reaffirmed 1996. ASME N510-1989, Testing of Nuclear Air-Treatment Systems, Reaffirmed 1995. ASME/ANSI AG-1-1997, Code on Nuclear Air and Gas Treatment, including Section HA of ASME AG-1a-2000 Addenda 	<p>ASME requests that the NRC revise Regulatory Guide 1.140 to endorse the following editions and addenda of the referenced codes and standards:</p> <ul style="list-style-type: none"> ASME N509-2002, Nuclear Power Plant Air-Cleaning Units and Components Reaffirmed 2008, or later editions and addenda of this standard. ASME AG-1-2014, Code on Nuclear Air and Gas Treatment (ASME N510 is now Superseded by this code), or later editions and addenda of this code. 	<p>RG 1.140 is in the process of being revised. The draft RG was issued for public comment in June 2012. It is anticipated that the revised RG will be issued by September 2016.</p>

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Regulatory Guide 1.142, Safety-Related Concrete Structures for Nuclear Power Plants (Other than Reactor Vessels and Containments) Rev. 2, November 2001	This regulatory guide contains references to ASME NQA-1-1983 and NQA-2-1983.	These references are now more than 30 years old, and ASME recommends that the NRC revise this regulatory guide to reference ASME NQA-1-2012, or later editions and addenda of this standard and to remove reference to NQA-2 because the requirements of NQA-2 have now been incorporated into NQA-1.	The staff reviewed this RG in January 2015, and concluded that a revision was warranted. This RG is currently being updated by the staff. The revision will address revised versions of standards ACI 349 and NQA-1. The draft RG is expected to be released for public comment by Q4 of FY2016. The results of the review can be found on the NRC's web site at: http://pbadupws.nrc.gov/docs/ML1501/ML15015A541.pdf .
Regulatory Guide 1.168, Verification, Validation, Reviews, and Audits for Digital Computer Software Used in Safety Systems of Nuclear Power Plants Rev. 2, July 2013	This regulatory guide contains references to NQA-1-2008, and	ASME requests that the NRC revise Regulatory Guide 1.168 to update this regulatory guide to reference ASME NQA-1-2012, or later editions and addenda of this standard.	Although your letter recommended rulemaking or a revision to this RG, there was no safety issue discussed in the letter. Given that rulemaking or regulatory guide revisions require significant staff resources, such revisions must be supported mainly by the safety issue. This RG is scheduled to undergo a periodic staff review in Q4 of FY 2018.

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<p>Regulatory Guide 1.175, An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing</p> <p>Rev. 0, August, 1998</p>	<p>This regulatory guide contains a reference to the ASME Code for Operations and Maintenance of Nuclear Power Plants, OM Code-1995.</p>	<p>ASME requests that the NRC revise this regulatory guide to update this reference to refer the reader to those editions and addenda of the OM Code incorporated by reference in 10 CFR 50.55a. In addition, ASME requests that the NRC revise this regulatory guide to endorse the OM Code, Subsection ISTE.</p>	<p>The staff plans to develop a draft revision of RG 1.175 in conjunction with the development of the draft revision of RG 1.174, as directed in SRM-SECY-11-0014. The schedule for developing a draft guide for RG 1.174 is dependent on work currently being performed by the NRC's Risk Management Regulatory Framework (RMRF) working group, as directed by the commission in SRM-SECY-13-0132. In this staff requirements memorandum (SRM), the RMRF working group was directed to develop a Commission Paper that, in part, preserves the insights contained in Enclosure 3 of SECY-13-0132, "Defense-in-Depth Observations and Detailed History," and includes a description of the interrelationships of several on-going activities, including the staff efforts to address the defense-in-depth direction in SRM-SECY-11-0014. On March 9, 2016, the Commission issued SRM-15-0168 (available at in http://www.nrc.gov/docs/ML1606/ML16069A370.pdf) in response to the RMRF Commission Paper. The SRM directs the staff to complete the next revision of RG 1.174. As part of this effort, staff plans to revise RG 1.175 to reflect similar changes. Based on this Commission direction, a draft revised RG 1.175 may be issued for public comment in the 4th quarter of calendar year 2016.</p>
<p>ASME NOG-1, Rules for Construction of Overhead and Gantry Cranes (Top Running Bridge, Multiple Girder) and ASME NUM-1, Rules for Construction of Cranes, Monorails, and Hoists (With Bridge or Trolley or Hoist of the Underhung Type)</p>	<p>None</p>	<p>ASME requests that the NRC issue a new regulatory guide to address the acceptability of using the latest editions of these standards.</p>	<p>See response to NUREG-0800 Section 9.1.5, Overhead Heavy Load Handling Systems, Rev. 1, 03/2007</p>

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Additional Recommendations for NRC Regulatory Guides	Because some ASME Nuclear Codes and Standards are referenced in multiple NRC regulatory guides, ASME recommends that revisions to certain regulatory guides should be processed concurrently to maintain consistent references to specific editions and addenda of these codes and standards.	<p>The following specific recommendations are offered:</p> <ul style="list-style-type: none"> a. Revisions to Regulatory Guides 1.7, 1.35, 1.35.1, 1.90, 1.107, and 1.136 should be processed concurrently because these regulatory guides each reference ASME Code, Section III, Division 2. b. Revisions to Regulatory Guides 1.8, 1.28, 1.52, 1.142, and 1.168 should be processed concurrently because these regulatory guides each reference ASME NQA-1. Also, because Regulatory Guides 1.140 and 1.52 both reference ASME AG-1, N509, and N510, revision to Regulatory Guide 1.140 should also be processed together with these regulatory guides. 	The ASME letter recommended the concurrent review and possible revision of two groups of related RGs: RGs 1.7, 1.35, 1.35.1, 1.90, 1.107 and 1.136; and RGs 1.8, 1.28, 1.52, 1.142, and 1.168. The NRC staff has established a Regulatory Guide Update Program that includes the periodic staff review of existing RGs, approximately every five years. In order to spread the work of these reviews, the staff follows a schedule of reviews and revisions. While the suggestion to group these particular revisions is appreciated, and it will be considered, it may not be able to be accommodated because of limited resource availability.
NUREG-0800 Section 3.8.1 Concrete Containment, Rev. 4, 09/2013	Although the specific editions and addenda of the ASME Boiler & Pressure Vessel Code, Section III, Div. 2 and Section XI, Subsections IWE and IWL are not identified in Section 3.8.1, the listed Regulatory Guides (1.7, 1.35, 1.35.1, 1.90, 1.107, and 1.136) do identify the applicable editions and addenda of these codes accepted by the NRC.	ASME recommended changes to the applicable regulatory guides to clarify which editions and addenda of these codes should be used by the NRC to determine the acceptability of concrete containments in accordance with NUREG-0800, Section 3.8.1.	<p>An NRC staff review of NUREG-0800, Section 3.8.1 identified no issues with the SRP section itself, In that 3.8.1 does not identify specific editions of referenced ASME codes.</p> <p>See the NRC responses Regulatory Guides (1.7, 1.35, 1.35.1, 1.90, 1.107, and 1.136 for actions proposed on the cited RGs.</p>

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<p>NUREG-0800 Section 9.1.5, Overhead Heavy Load Handling Systems, Rev. 1, 03/2007</p>	<p>ASME has recommended that the NRC issue a new regulatory guide to address the acceptability of using the latest editions of ASME NOG-1 and NUM-1.</p>	<p>If the NRC were to take this action, ASME recommended that the NRC revise Section 9.1.5 of NUREG-0800 to reference this new RG for later editions and addenda of these standards that the NRC finds acceptable, rather than continue to reference the ASME NOG-1 2004 Edition.</p>	<p>The NRC staff has examined the 2010 and 2015 versions of the ASME NOG-1 and concluded that the changes, when compared to the 2004 version, may justify an update to Section 9.1.5 of NUREG-0800. The NRC will consider referencing the newest version of ASME NOG-1 the next time Section 9.1.5 is due for an update. Although NRC endorsement would facilitate use of the standard in regulatory processes, it is not essential for use. Licensees and license applicants may propose use of the newer versions of ASME NOG-1 in licensing submittals.</p>
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