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Incorporation by Reference of Revisions of ASME Regulatory Guides

Comment On: NRC-2012-0059-0001

Approval of American Society of Mechanical Engineers Code Cases

Document: NRC-2012-0059-DRAFT-0011

Comment on FR Doc # 2016-04355

Submitter Information

Name: Charles Pierce

Submitter's Representative: Catherine B. Galloway

Organization: Southern Nuclear Operating Company

General Comment

See attached file(s)

Attachments

NL-16-0722

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May 16, 2016

NL-16-0722

Annette Vietti-Cook
Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff

Comments on Proposed 10 CFR 50.55a Rule Change, "Approval of American Society of
Mechanical Engineers' Code Cases" (Docket ID NRC-2012-0059)

Dear Ms. Vietti-Cook:

Southern Nuclear Operating Company (SNC) hereby submits comments for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, SNC is providing comments on proposed 10 CFR 50.55a rule change, "Approval of American Society of Mechanical Engineers' Code Cases" (Docket ID NRC-2012-0059), as noticed in the Federal Register (*Federal Register* Vol. 81, No. 41, 10780), dated March 2, 2016.

SNC has reviewed the draft RIS and has comments in the attachment to this letter.

This letter contains no NRC commitments. If you have any questions or comments, please contact Justin Wheat at (205) 992-5998.

Respectfully submitted,

C. R. Pierce
Regulatory Affairs Director

CRP/DN/cbg

Attachment: SNC Comments on Docket ID NRC-2012-0059

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Engineering
SNC Document Services - RType: CGA02.003

Comments on Proposed 10 CFR 50.55a Rule Change,
"Approval of American Society of Mechanical Engineers' Code Cases"
(Docket ID NRC-2012-0059)

Attachment

SNC Comments on Docket ID NRC-2012-0059

Comments on Proposed 10 CFR 50.55a Rule Change, "Approval of American Society of Mechanical Engineers' Code Cases,"
(Docket ID NRC-2012-0059)

By Southern Nuclear

#	Identifier (Section, Page, Paragraph)	Comment	Proposed Resolution
1	Pg 10789, N-795, Condition 2	<p>Remove proposed condition 1 for prohibiting nuclear heat – It is important to note that the applicability for this code case does not apply to the class 1 leakage test at the end of the refueling outage which applies to all of a BWR Class 1 leakage boundary. This scope of a VT-2 inspection for that covered under this code case is for Class 1 repair and/or replacement activities that may occur during a mid-cycle shutdown. The scope of inspection that will be conducted would be limited to only those components that impact the class 1 leakage boundary and general, will be a very small inspection scope. Significant work on the RPV Pressure Boundary is planned and scheduled during refueling outages.</p> <p>Appendix G applies to the reactor pressure vessel fracture toughness requirements; this condition would only apply repairs to the RPV. If the basis for the conditions is Appendix G, then the condition need only apply to the RPV. In addition, the condition is contrary to the requirements of Appendix G for fracture toughness. Performance of an additional cold leakage test places the unit in a position of reduced margin, unnecessarily approaching the fracture toughness limits defined in the Technical Specification Pressure-Temperature (P-T) curves.</p> <p>In addition, condition 1 will render this code case unusable to utilities. If condition 1 is not removed, the code case should be disapproved.</p>	Remove Condition 1.

#	Identifier (Section, Page, Paragraph)	Comment	Proposed Resolution
2	Pg 10790, N-799, Condition 3	<p>Remove condition 3 full volume requirements - The third proposed condition (No. 2b in the draft RG) is that the examination of the dissimilar metal welds between reactor vessel nozzles and components, and between steam generator nozzles and pumps must be full volume. As described, the examination of coarse grained materials is problematic due to effects such as sound beam redirection and scattering, and therefore robust techniques must be used on the full volume to ensure that flaws are detected.</p> <p>The current procedure that is applied is qualified for detection and length-sizing of DM welds in accordance with Section XI, Appendix VIII, Supplement 10 for the inner 3rd of the weld. Since detection is not an issue, the basis for performance of a full volume examination has not been provided. In addition, a full weld volume inspection is performed during the Section III RT examination. It is believed that the condition was envisioning an OD surface applied examination when adding this examination to ensure an exam was performed from both sides; however, this is not supported in the basis.</p> <p>If condition 3 is not removed, it is necessary to clarify the intent. It is unclear if the intent is to require an OD surface exam or to require 100% weld UT. Please specify and add basis.</p>	Remove Condition 3.

#	Identifier (Section, Page, Paragraph)	Comment	Proposed Resolution
3	Pg 10790, N-799, Condition 5	<p>Remove Condition 5 for requiring the examination's acceptability to be based on an ultrasonic examination of the qualified volume and a flaw evaluation of the largest hypothetical crack that could exist in the volume not qualified for ultrasonic examination.</p> <p>Examination of these welds are performed from the ID; therefore, detection within the N-795 using the current procedure that qualified for detection and length-sizing of DM welds in accordance with Section XI, Appendix VIII, Supplement 10 for the inner 3rd of the weld. Based on proper inspection capability/qualification, this condition is not applicable.</p> <p>Condition 6 captures the issue with depth sizing.</p>	Remove Condition 5.
4	DG-1298 N-818 Page 15	In DG-1298, code case N-818 is listed as an unacceptable Section III code case. However, as documented in the Summary, the NRC believes that an analytical approach for the acceptance of certain fabrication flaws could be acceptable if appropriately justified and the scope is limited to ferritic materials.	Conditionally accept code case N-818 with limitation to ferritic materials and certain fabrication flaws with appropriate justification. Acceptable fabrication flaw types and criteria for appropriate justification should be provided.