

# Approval of ASME Code Cases for Industry Use

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## Introduction

- Current approval of ASME Code Cases for industry-wide use is governed by 10 CFR 50.55a
  - 10 CFR 50.55a(a)(1)(iii) incorporates certain code cases, like N-513-3, N-722-1, N-729-4, etc.
  - 10 CFR 50.55a(a)(3) incorporates regulatory guides that list the ASME Code Cases that are generically approved for industry.
    - RG 1.84 for ASME Section III
    - RG 1.147 for inservice inspection
    - RG 1.192 for operation and maintenance.

## RG Revision

- RG revision is a significant regulatory effort:
  - RG 1.84
    - Revision 35 10/2010
    - Revision 36 08/2014
    - Revision 37 01/2018
  - RG 1.147
    - Revision 16 10/2010
    - Revision 17 08/2014
    - Revision 18 01/2018
  - RG 1.192
    - Initial Revision 06/2003
    - Revision 1 10/2014
    - Revision 2 01/2018

## Operating Experience

- Between revisions, licensee use of new/updated Code Cases requires individual submittals, often in shortened timeframe
  - Code Case N-513-4
    - ASME approved 5/7/2014
    - Arkansas Nuclear One emergency request submitted 10/31/2014
    - Exelon fleet request submitted 1/28/2016
    - Fermi request submitted 8/15/17
    - Cooper request submitted 8/17/17
    - Perry emergency request submitted 8/20/17
- Regulator and licensee efficiencies could be realized if individual Code Cases could be approved between RG and regulation revisions without licensee submittals.

## Industry Proposal Near-Term Approach

- Industry selects ASME-approved Code Cases with generic applicability
- Industry submits a single combined relief request for all applicable plants using the current regulatory process
- NRC SE would list any limitations or conditions
- NRC SE would be part of all licensee dockets

## Industry Proposal Long-Term Approach

- Industry would request a revision to 10 CFR 50.55a to incorporate an expedited review process for ASME-approved Code Cases
- Would allow NRC to publish a SE with any relative limitations or conditions without a licensee submittal
- Would allow licensees to use NRC-approved Code Cases between RG revisions and 10 CFR 50.55a rulemaking



# Discussion