

U.S. Nuclear Regulatory Commission Public Meeting Summary

August 27, 2018

Title: Public Meeting to Discuss Rulemaking to Incorporate by Reference American Society of Mechanical Engineers Codes into the U.S. Nuclear Regulatory Commission Regulations

Meeting Identifier: 20180815

Date of Meeting: July 30, 2018

Location: Marriott Marquis Washington DC, Independence Salons ABC
901 Massachusetts Ave, NW Washington, DC

Type of Meeting: Category 3

Purpose of the Meeting(s): The purpose of this meeting was to provide a status of the "Approval of American Society of Mechanical Engineers [ASME] Code Cases, Revision 38" proposed rule, and to provide information about an upcoming proposed rule titled "American Society of Mechanical Engineers 2015—2017 Code Editions Incorporation by Reference," which would incorporate by reference (IBR) these ASME Code Editions into the U.S. Nuclear Regulatory Commission (NRC) regulations. Specifically, the NRC intends to IBR the 2015 and 2017 Editions of the ASME Boiler and Pressure Vessel Code (BPV Code), Section III, Division 1, and the ASME BPV Code, Section XI, Division 1 into Section 50.55a, "Codes and standards," of Title 10 of the *Code of Federal Regulations* (10 CFR). The NRC also intends to IBR the 2015 and 2017 Editions of the Operation and Maintenance of Nuclear Power Plants, "Division 1, OM Code: Section IST" (OM Code) into 10 CFR 50.55a.

General Details: Representatives included participants attending the ASME Boiler and Pressure Vessel Code Week. In total, there were approximately 99 participants in this meeting. A facilitated bridgeline was used to coordinate incoming feedback received from the attendees that participated by phone. A list of attendees is provided as an attachment to this meeting summary.

The meeting was scheduled from 5:00 p.m. – 7:00 p.m.; however the meeting adjourned at 6:00 p.m. after the conclusion of the question and answer period. Approximately 90 people were present during the meeting, which included NRC staff and external stakeholders. There were also an additional 9 people participating in the meeting remotely using a teleconference line. The meeting began with a discussion of the purpose and overview of the meeting. Next, information regarding the scope of the two 10 CFR 50.55a rulemakings was presented, after which detailed technical information was presented by NRC staff. The NRC staff then opened the meeting for questions and comments from the public, explaining that the comments and suggestions provided by the attendees would be considered in preparing the proposed rules, but that the NRC would not prepare formal responses to these questions and comments. The NRC staff encouraged the meeting participants to submit their comments on the docket during the public comment periods of the rulemakings.

Summary of Presentations: Dr. David Rudland, Senior Level Advisor, Division of Materials and License Renewal, Office of Nuclear Reactor Regulation, provided opening remarks. Jim O'Driscoll, Project Manager, Division of Rulemaking, Office of Nuclear Materials Safety and

Safeguards, presented information regarding the status of the 10 CFR 50.55a rulemakings. Mr. O'Driscoll mentioned that the ASME Code Case proposed rule is expected to be published in the *Federal Register* for comment in August 2018, and the ASME BPV/OM 2015-2017 Editions proposed rule is expected to be published in the *Federal Register* for comment in the fall of 2018. The NRC technical subject matter experts presented information on the conditions under consideration. At the end of the technical discussions, the NRC staff addressed questions from stakeholders regarding items of interest in the rulemaking process and conditions under consideration.

The first technical presentation was provided by Dr. Chakrapani Basavaraju and focused on the IBR of the 2015 and 2017 Editions of the ASME BPV Code, Section III. The presentation included a discussion on five parts to a condition on Appendix XXVI, Rules for the Construction of Class 3 Buried Polyethylene Pressure Piping. The presentation also included a discussion on two proposed provisions of a new condition that would address the visual inspection and acceptance criteria for bolts, studs and nuts.

The second presentation was provided by Yamir Diaz-Castillo and focused on two conditions being considered by the NRC staff for ASME Section III. The first is a new condition involving the use of the term "Certifying Engineer" in lieu of "Registered Professional Engineer". The second is a revised condition involving the independence of inspection.

The third presentation was provided by Stephen Cumblidge and focused on the IBR of the 2015 and 2017 Editions of the ASME BPV Code, Section XI into 10 CFR 50.55a, including eight conditions being considered for addition and several other conditions being considered for modification by the NRC staff for ASME Section XI. Stakeholders asked two questions regarding Section XI. The first question was a request for additional details regarding the proposed modifications to the conditions associated with pressure testing requirements in 10 CFR 50.55a(b)(2)(xx)(B) and 10 CFR 50.55a(b)(2)(xxvi). The NRC responded that the proposed changes to the conditions were minimal and that the details were omitted from the presentation in the interest of time, and that these details will be available when the proposed rule is published for public comment. The second question was related to the proposed conditions associated with the IBR of later revisions of Code Cases 729 and 770 and how the proposed conditions relate to Topical Report MRP-335, Revision 3-A. Specifically, the NRC staff was asked if a licensee would get credit for peening without the need to submit a proposed alternative to the NRC for review and approval. The NRC responded that the proposed conditions would eliminate the need for a licensee to submit an alternative request, provided the licensee follows MRP-335, Revision 3-A, which has been endorsed by the NRC.

In the fourth presentation, Robert Wolfgang provided a discussion on the IBR of the 2015 and 2017 Editions of the ASME OM Code, including two conditions being considered for addition into 10 CFR 50.55a and five (5) other conditions being considered for modification by the NRC staff for the ASME OM Code. One new condition is a proposed requirement that licensees submit their inservice test (IST) Program Plan consistent with the current provisions in the ASME OM Code. The second new condition would specify that use of the 2015 Edition of the ASME OM must include Appendix IV of the 2017 ASME Code. Stakeholders asked two questions regarding two conditions being considered for modification. The first question related to a modified condition that would clarify that the valve position indication condition applies to all valves with remote position indicators within the scope of Subsection ISTC of the ASME OM

Code, including motor operated valves (MOVs) in Mandatory Appendix III of the Code. The stakeholder requested the basis or reason for the need to modify the condition to specifically include MOVs in Mandatory Appendix III, and asked if this was perhaps an oversight from the creation of the condition in a previous rulemaking or if there was some new information driving the inclusion of these MOVs. The NRC staff stated that in the discussion section of the proposed rule, it is stated that “ISTC-3700 references Mandatory Appendix III for valve position testing of MOVs. The development of Mandatory Appendix III was intended to verify valve position indication as part of the diagnostic testing performed on the intervals established by the appendix. This clarification will ensure that verification of valve position indication is understood to be important for all valves with remote position indication addressed in Subsection ISTC and all of its mandatory appendices.” The NRC staff also encouraged the stakeholder to submit this question, if desired, during the public comment period for the forthcoming proposed rule. The second question related to a modified condition that would relax the time schedule for complying with the latest edition of the ASME OM Code for IST programs from 12 months to 18 months for initial IST programs and subsequent 10-year updates. A stakeholder commented that, in his opinion, operating reactors need a 24-month interval versus the proposed 18-month interval to comply with the latest edition of the ASME OM Code, due to issues that arise during the process of updating these programs. The stakeholder asked if 24 months would be a more appropriate interval for operating reactors. The NRC staff responded that the NRC is usually very responsive in processing relief requests associated with these updates and can process them in less than a year. The NRC staff explained that a 24-month time schedule would be contrary to the intent of the requirement to apply the latest edition of the ASME OM Code, which is published approximately every 24 months. The NRC staff encouraged the stakeholder to submit this comment during the public comment period for the forthcoming proposed rule.

Public Participation Themes: The stakeholders appreciated the information presented by the NRC staff, the opportunity to discuss their respective comments on the rulemaking efforts, and the NRC staff’s responses to the comments and questions.

Action Items/Next Steps:

NRC staff will continue the process of completing the following:

- Proposed Rule for the ASME BPV/OM 2015-2017 Editions (NRC-2016-0082)
- Proposed Rule for the ASME Code Cases, Revision 38 (NRC-2016-0024)

Attachments:

- Meeting agenda (ADAMS Accession No. ML18198A075)
- NRC presentation (ADAMS Accession No. ML18205A385)
- Meeting attendees

LIST OF ATTENDEES FOR 7/30/2018 CATEGORY 3 PUBLIC MEETING	
Name	Affiliation
James O'Driscoll	NRC
Dave Rudland	NRC
Stephen Cumblidge	NRC
C. Basavaraju	NRC
Yamir Diaz-Castillo	NRC
Robert Wolfgang	NRC
Cris Brown	NRC
Ed Pleins	Westinghouse
Jeremy Mayo	TVA
Truong Vo	Dominion
Kevin Rhyne	Duke Energy
Jim Boughman	Duke Energy
Andy Nettles	Duke Energy
Leslie Terry	NRC
Lauren Powers	ASME
Cheng Lin	Kinectrics
Steven Xin	Kinectrics
Robin Dyle	EPRI
Al Meichler	Cere Consultants, Inc.
Stewart Bailey	NRC
Kevin Hacken	Dominion
Gene Farrell	Exelon
Bryce Lehman	NRC
Kamal Manoly	NRC
Mark Wilson	SNC
Reagan Wilkerson	SNC-Hatch
Dale Willyard	SNC-Hatch
Paul Coco	HSB
Steve Bobbyock	Exelon
Seth Rios	Exelon
Mark Ferris	Duke Energy
Steve Norman	Sargent & Lundy
Tom Musto	Sargent & Lundy
Scott Kulat	Inservice Engineering
Joel Harrison	System One
Seung Min	NRC

Kevin May	Westinghouse
Ron Janowiak	Exelon
Ron Lippy	True North Consulting
Augi Cardily	True North Consulting
Eric Henry	True North Consulting
Dan Lamond	True North Consulting
Gene Nauratil	True North Consulting
Do Jun Shim	Structural Integrity
Itaru Saito	Japan Nuclear Safety Institute
Masami Ando	Hitachi-GE Nuclear Energy
Nathan Palmer	EPRI
Safar Shojaei	STPNOC
Warren Bamford	Bamford Consulting Services
Stephen Marlette	Westinghouse
Matthew Gilliet	Westinghouse
Danny Cazdos	LMT-Curtis Wright
Tim Thulen	Duke
William Sims	Entergy
A. Thomas Roberts	MPR Associates, Inc.
Steve McCracken	EPRI
Carl Latiolais	EPRI
Tony Cinson	EPRI
Thien Do	Southern Nuclear
Heather Malikowski	Exelon
Timothy Adams	Jensen Hughes
Raymond Pace	Impresia
Roy Folley	Arizona Public Service
Tadahiro Mitasuhashi	Toshiba
Hiroya Ichikara	Toshiba
Tetsushi Yamaoka	Toshiba
Eric Lantz	South Texas Project
James Williams	South Texas Project
Selena Willoughby	Westinghouse
Douglas Henry	Westinghouse
Mark Moenssen	Westinghouse
Jongkeun Hwang	Smartek EDC
Sunwoong Choi	HNU
Steve Werberct	NuScale
James Haithcox	Flowserve

Sarah Patterson	PPI
Tim Griesbach	SIA
Chris Lohse	SIA
Kim Verderber	ASME
Henry Stephens	ASME
J. Fredhall	CW
P. Krisuwaswami	Emc ²
Suresh Kalyanam	Emc ²
Won Park	ANSCO
John Brassard	DEI
Agi Zbib	Energy Northwest
Abbas Mostala	Energy Northwest
Young Eui Kwon	KINS
Kyungwan Roh	KINS
Gary Park	Ideal Solutions
Philip Leininger	Nebraska Power District
John Akerman	Nebraska Power District
Matt Brandes	ISCO
Bongsang Lee	KAERC
Shin Wang	Terrapower LLC
Mike Arcaro	GE-Hitachi
Jim O'Sullivan	Consultant
Lance Sharrett	APS / Palo Verde
Mark Gowin	TVA

SUBJECT: U.S. Nuclear Regulatory Commission Public Meeting Summary-Public Meeting to Discuss Rulemaking to Incorporate by Reference American Society of Mechanical Engineers Codes into the U.S. Nuclear Regulatory Commission Regulations [NRC-2016-0082; RIN 3150-AJ74], **August 16, 2018**

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KManoly, NRR

SMin, NRR

JO'Driscoll, NMSS

GLappert, NMSS

MKhanna, NMSS

ADAMS Accession No. ML18219B862

*via email

OFFICE	NMSS/DRM/RRPB/PM	NMSS/DRM/MRPB/RS	NMSS/DRM/RRPB/BC
NAME	JO'Driscoll	GLappert (ALove-Blair for)	MKhanna
DATE	8/6/2018	8/16/2018	8/27/2018

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