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General Comment

Comments to proposed rulemaking incorporating 2015-2017 OM Code Editions (See Attached)

Attachments

Palmer_Rulemaking comments_011819

Glen Palmer Comments - January 18, 2019

It has been observed that the wording in the proposed Rulemaking does not clearly identify requirements for examination and testing of dynamic restraints, (snubbers) to be a part of IST, 50.55a(f)(4) *Inservice testing* vs. ISI, 50.55a(g) *Preservice and inservice inspection requirements* and will require some changes for clarity. Below are the proposed changes that have been discussed at industry meetings and are now sent to the NRC for consideration.

Background:

The NRC has already identified a clear path for snubbers to be considered a part of IST along with pumps and valves in RG 1.192.

In 1990, the ASME published the initial edition of the OM Code that provides rules for IST and inservice examination of pumps, valves, and dynamic restraints (snubbers). The OM Code was developed and is maintained by the ASME Committee on Operation and Maintenance of Nuclear Power Plants. The OM Code was developed in response to the ASME Board on Nuclear Codes and Standards directive that transferred responsibility for development and maintenance of rules for the IST and inservice examination of pumps, valves, and dynamic restraints (snubbers) from the ASME Section XI Subcommittee on Nuclear Inservice Inspection to the ASME OM Committee. The ASME intended the OM Code to replace Section XI rules for IST and inservice examination of pumps, valves, and dynamic restraints (snubbers), and the Section XI rules for IST and inservice examination of these components that had been incorporated by reference into NRC regulations have been deleted from Section XI. The NRC endorsed the OM Code for the first time in an amendment to 10 CFR 50.55a published on September 22, 1999 (64 FR 51370). The NRC endorsed OM Code Cases through this guide for the first time in June 2003. It should be noted that the title of the OM Code was changed beginning with the 2009 Edition to "Operation and Maintenance of Nuclear Power Plants."

Looking at 50.55a(g), the current pointer to 50.55a(f) is only for pumps and valves.

Requirements for inservice testing of Class 1, Class 2, and Class 3 pumps and valves are located in § 50.55a(f)

It does not identify dynamic restraints (snubbers).

Although the wording is unclear, the path from the ISI Code, Section XI Class 1, 2 and 3, to the ASME OM Code, Section IST is identified through paragraph 50.55a(g)(4), which does point to the ASME OM Code:

(4) *Inservice inspection standards requirement for operating plants.* Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) that are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of editions and addenda of the ASME BPV Code (or ASME OM for snubber examination and testing) that become effective subsequent to editions specified in paragraphs

(g)(2) and (3) of this section and that are incorporated by reference in paragraph (a)(1)(ii) or (iv) for snubber examination and testing of this section, to the extent practical within the limitations of design, geometry, and materials of construction of the components.

This clearly identifies the ASME OM Code for dynamic restraints (snubbers), which includes ISTA-1100 and the scoping of non Class 1, 2 and 3 supports. The current pointer from 50.55a(g)(4) to ASME OM Code identifies snubbers to be under the ASME OM Code.

ISTA-1100 Scope

Section IST establishes the requirements for preservice and inservice testing and examination of certain components to assess their operational readiness in light-water reactor nuclear power plants. It identifies the components subject to test or examination, responsibilities, methods, intervals, parameters to be measured and evaluated, criteria for evaluating the results, corrective action, personnel qualification, and record keeping. These requirements apply to (a) pumps and valves that are required to perform a specific function in shutting down a reactor to the safe shutdown condition, in maintaining the safe shutdown condition, or in mitigating the consequences of an accident

(b) pressure relief devices that protect systems or portions of systems that perform one or more of the three functions identified in subpara. ISTA-1100(a)

(c) dynamic restraints (snubbers) used in systems that perform one or more of the three functions identified in subpara. ISTA-1100(a), or to ensure the integrity of the reactor coolant pressure boundary

When the NRC publishes the new Rulemaking, dynamic restraints (snubbers) should be identified along with pumps and valves under 50.55a(f), for added clarity.

Below is a suggested markup to the proposed Rulemaking to accomplish this change.

50.55a(f)(4) *Inservice testing standards requirement for operating plants.* Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps, valves and dynamic restraints (snubbers) that are within the scope of the ASME OM Code must meet the inservice test requirements (except design and access provisions) set forth in the ASME OM Code and addenda that become effective subsequent to editions and addenda specified in paragraphs (f)(2) and (3) of this section and that are incorporated by reference in paragraph (a)(1)(iv) of this section, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The inservice test requirements for pumps, valves and dynamic restraints (snubbers) that are within the scope of the ASME OM Code but are not classified as ASME BPV Code Class 1, Class 2, or Class 3 may be satisfied as an augmented IST program in accordance with paragraph (f)(6)(ii) of this section without requesting relief under paragraph (f)(5) of this section or alternatives under paragraph (z) of this section. This use of an augmented IST program may be acceptable provided the basis for deviations from the ASME OM Code, as incorporated by reference in this section, demonstrates an acceptable level of quality and safety, or that implementing the Code provisions would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety, where documented and available for NRC review.

50.55a(g) *Preservice and inservice inspection requirements.* Systems and components of boiling and pressurized water-cooled nuclear power reactors must meet the requirements of the ASME BPV Code as specified in this paragraph. Each operating license for a boiling or pressurized water-cooled nuclear facility is subject to the following conditions. Each combined license for a boiling or pressurized water-cooled nuclear facility is subject to the following conditions, but the conditions in paragraphs (g)(4) through (6) of this section must be met only after the Commission makes the finding under §52.103(g) of this chapter. Requirements for inservice testing of pumps, valves and dynamic restraints (snubbers) are located in paragraph (f) of this section.

50.55a(g)(4) *Inservice inspection standards requirement for operating plants.* Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) that are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of editions and addenda of the ASME BPV Code (or ASME OM Code for dynamic restraint (snubber) examination, and testing and service life monitoring) that become effective subsequent to editions specified in paragraphs (g)(2) and (3) of this section and that are incorporated by reference in paragraph (a)(1)(ii) or (iv) for snubber examination and testing of this section, to the extent practical within the limitations of design, geometry, and materials of construction of the components. Components that are classified as Class MC pressure retaining components and their integral attachments, and components that are classified as Class CC pressure retaining components and their integral attachments, must meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of the ASME BPV Code and addenda that are incorporated by reference in paragraph (a)(1)(ii) of this section, subject to the condition listed in paragraph (b)(2)(vi) of this section and the conditions listed in paragraphs (b)(2)(viii) and (ix) of this section, to the extent practical within the limitation of design, geometry, and materials of construction of the components.