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General Comment

See attached file(s)

Attachments

LO-0119-64284 Federal Registry Comments on BRVC Code Edition Signed

January 23, 2019

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

SUBJECT: NuScale Power, LLC Comments on the proposed rule *American Society of Mechanical Engineers 2015-2017 Code Editions Incorporation by Reference*, Docket ID NRC-2016-0082.

The attached comments are submitted in response to Federal Register Notice 2018-24076 (83 Fed. Reg. 56,156) requesting comments on the the U.S. Nuclear Regulatory Commission (NRC) proposed rule *American Society of Mechanical Engineers 2015-2017 Code Editions Incorporation by Reference* (Docket ID NRC-2016-0082).

If you have any questions, please contact me at 541-360-0549 or at gbecker@nuscalepower.com.

Sincerely,



Gary Becker
Regulatory Affairs Counsel
NuScale Power, LLC

Attachment: NuScale Power, LLC Comments on proposed rule *American Society of Mechanical Engineers 2015-2017 Code Editions Incorporation by Reference*, Docket ID NRC-2016-0082

NuScale Power, LLC Comments on proposed rule *American Society of Mechanical Engineers 2015-2017 Code Editions Incorporation by Reference*, Docket ID NRC-2016-0082

Comment:

Revise 10 CFR 50.55a(b)(1)(iii) to allow use of Editions and Addenda after the 2008 Addenda. 10 CFR 50.55a(b)(1)(iii) pertains to the allowed use of ASME Boiler and Pressure Vessel Code, Section III Subarticles NB-3600, NC-3600, and ND-3600 that are acceptable for seismic design of piping. The current rule allows the use of Subarticles NB-3600, NC-3600, and ND-3600 for the seismic design of piping in the 2006 Addenda through the 2008 Addenda, subject to the conditions of paragraph (b)(1)(iii). The rule should be revised to include Editions and Addenda after the 2008 Addenda. For example, the revised rule may read: "(iii) ... Applicants or licensees may use Subarticles NB-3600, NC-3600, and ND-3600 for the seismic design of piping in the 2006 Addenda through the 2013 Edition, subject to the conditions of this paragraph corresponding to those subarticles."

Justification:

10 CFR 50.55a (b)(1)(iii) does not allow the use of Subarticles NB-3600, NC-3600, and ND-3600 in the 1994 Addenda through the 2005 Addenda for seismic design of piping. It appears this exclusion relates to NRC's disagreement with certain provisions in the Subarticles during that time span. Beginning with the 2006 Addenda, two significant changes are apparent in what are known as the "alternative rules" for analysis of reversing dynamic (seismic) loads. First, the specification of seismic analysis methods (including analysis type, spectrum peak broadening, and damping) in NB-3656(b)(3) and NC/ND-3655(b)(3) was removed. Second, guidance on analyzing piping systems with unbalanced distributions of plastic strain was added to NB-3656(b)(5) and NC/ND-3655(b)(5). Coincident with these changes, 10 CFR 50.55a(b)(1)(iii) allows NB-3600, NC-3600, and ND-3600 in the 2006 Addenda to be used for piping seismic design, and this allowance extends through the 2008 Addenda.

However, it is not clear why the use of Subarticles NB-3600, NC-3600, and ND-3600 for piping seismic design later in subsequent Addenda and Editions of the Code is not allowed by 10 CFR 50.55a(b)(1)(iii). For example, NB-3656 and NC/ND-3655 of the 2013 Edition have only immaterial differences from the currently-endorsed 2008 Addenda, namely textual clarifications and updates to some referenced stress indices that are not specific to seismic analysis. It appears that exclusion of the post-2008 Addenda, up to and including the 2013 Edition, may have been inadvertent. Therefore, 10 CFR 50.55a(b)(1)(iii) should be made consistent with the post-2008 Code Editions and Addenda otherwise allowed by 10 CFR 50.55a(a)(1)(i), allowing those Editions and Addenda to be used for the seismic design of piping to the extent appropriate from a technical perspective.