



**REEDY ENGINEERING, INC.**  
ENGINEERING MANAGEMENT CONSULTANTS

January 8, 1997

NRC-97-001

Mr. William M. Hill Jr.  
Secretary of the Commission  
USNRC  
Washington, D.C. 20555-0001

**Subject: ASME Codes and Standards**

Dear Mr. Hill,

I would appreciate being included as a speaker at the January 22, 1997 Commission meeting on the subject of ASME Codes and Standards. I would only need about five minutes for my presentation.

A summary of this presentation is as follows:

I believe that there has been much confusion, concern, and unnecessary costs and delays for all of the nuclear power plant owners in the United States with regard to use of ASME Codes and Standards. I believe that the NRC Staff is setting NRC policy based on questionable and sometimes incorrect interpretations of ASME Codes and Standards endorsed by the Commission.

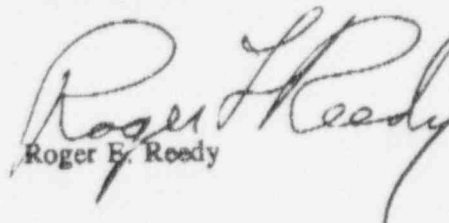
I propose that an idea to help solve this problem would be for the Staff to use an Advisory Committee of Code experts to review Regulatory Guides, Generic Letters, Information Notices, and other public documents that discuss application of these Codes and Standards. The Advisory Committee should include NRC, ASME, Authorized Inspection Agencies, and Code experts from the nuclear industry.

Further, when a utility is accused of violating Code requirements, there should be an appeal process to follow. ASME already has such a process, which could be used or supplemented as might be deemed necessary by the Commission.

Implementation of these ideas would eliminate the many unnecessary costs, delays and confusion now rampant in the US nuclear industry, and it would create an environment of fairness and trust.

It is my idea to be at the meeting, and if this request is granted, I can answer any questions you or the Commissioners may have.

Very truly yours,

  
Roger E. Reedy

RFR/ajk