

May 28, 2020

Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001

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Attention: Rulemaking and Adjudications Staff

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Subject: Final Rule Regarding 10 CFR 50.55a(b)(2)(xxvi), 10 CFR Part 50, RIN 3150-AJ74

Reference: Federal Register / Vol. 85, No. 86, pp. 26540 - 26581 / Monday, May 4, 2020 / Rules and Regulations

Dear Sir or Madam:

The subject recent rule regarding to 10 CFR 50.55a becomes effective on June 3, 2020. The EPRI Welding and Repair Technology Center Integration Committee (WRTC IC) would like to bring to the attention of the NRC staff a concern pertaining to the revised pressure testing condition in 10 CFR 50.55a(b)(2)(xxvi). It is the opinion of the WRTC IC that this pressure testing condition may invoke unintended requirements or, as a minimum, open to interpretation.

10 CFR 50.55a(b)(2)(xxvi) in the current edition of 10 CFR Part 50 states:

“Section XI condition: Pressure testing Class 1, 2, and 3 mechanical joints. The repair and replacement activity provisions in IWA-4540(c) of the 1998 Edition of Section XI for pressure testing Class 1, 2, and 3 mechanical joints must be applied when using the 2001 Edition through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section.”

IWA-4540(c) from the 1998 Edition of ASME Section XI also states:

“Mechanical joints made in the installation of pressure retaining items shall be pressure tested in accordance with IWA-5211(a). Mechanical joints for component connections, piping, tubing (except heat exchanger tubing), valves, and fittings, NPS-1 and smaller, are exempt from the pressure test.”

Based on current requirements in 10 CFR 50.55a(b)(2)(xxvi), Owners (i.e., Licensees) pressure test Class 1, 2, and 3 mechanical joints in accordance with IWA-4540(c) of the 1998 Edition. As noted above, the current condition in 10 CFR 50.55a(b)(2)(xxvi) is being revised by the final rule listed in Reference 1. The revised condition states:

“Section XI condition: Pressure testing Class 1, 2, and 3 mechanical joints. When using the 2001 Edition through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section, licensees shall pressure test in accordance with IWA-5211(a) mechanical joints in Class 1, 2, and 3 piping and components greater than NPS-1 which are disassembled and reassembled during the performance of a Section XI repair/ replacement activity requiring documentation on a Form NIS-2. The system pressure test and NDE examiners shall meet the requirements of the licensee’s/applicant’s current ISI code of record.”

The revised condition in 10 CFR 50.55a(b)(2)(xxvi) could have a significant adverse effect on Owners. As written, the revised condition will prohibit the use of any of the IWA-4540(b) pressure testing exemptions for repair/replacement activities that include the disassembly and reassembly of a

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mechanical joint in piping and components greater than 1" nominal pipe size. Consequently, some repair/replacement activities currently exempt from pressure testing by both the ASME Section XI Code and the current edition of 10 CFR 50.55a will have to be pressure tested once the final rule becomes effective on June 3, 2020. For example, an ASME Section XI pressure test is not currently required when a Class 1, 2, or 3 valve is disassembled and reassembled to replace a valve disc. This is because the replacement of a valve disc is exempt from pressure testing by IWA-4540(b) in the 2001 Edition or later. However, after the final rule becomes effective on June 3, 2020, this repair/replacement activity would require pressure testing in accordance with 10 CFR 50.55a(b)(2)(xxvi) because the mechanical joint was disassembled and reassembled "during performance of a Section XI repair/replacement activity requiring documentation on a Form NIS-2".

The current wording in the 10 CFR 50.55a(b)(2)(xxvi) condition can be interpreted to prohibit Owners from using any of the pressure testing exemptions of IWA-4540(b) for repair/ replacement activities that require the disassembly and reassembly of a mechanical joint in Class 1, 2, and 3 piping and components greater than NPS 1 requiring documentation on a Form NIS-2, even if the repair/replacement activity does not affect pressure-retaining parts in the mechanical joint, or involves only the replacement of bolting.

The EPRI WRTC IC respectfully requests that the NRC consider the noted concerns and provide clarification to the industry on the intent of the 10 CFR 50.55a(b)(2)(xxvi) condition in its final rule on 10 CFR 50.55a. Specifically, clarify if the revised condition is intended to prohibit application of the pressure testing exemptions of IWA-4540(b) on mechanical joints in Class 1, 2, and 3 piping and components greater than 1" NPS that are disassembled and reassembled during the performance of repair/replacement activities that require documentation on a Form NIS-2.

Should you have any questions pertaining to the comments provided in this letter, please contact Greg Frederick or Dan Patten for clarification.

Sincerely,

Greg Frederick

Greg Frederick (May 28, 2020 11:50 EDT)

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