



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 27, 2020

Thomas Vogan, Chair  
ASME Board on Nuclear Codes and Standards

Gregory Frederick, Program Manager  
EPRI Welding and Repair Technology Center

Dan Patten, Manager  
Fleet Programs Engineering  
Energy Harbor Nuclear

SUBJECT: PRESSURE TESTING CONDITION IN 10 CFR 50.55A(B)(2)(XXVI)  
(85 FR 26540)

References: 1. ASME letter dated May 29, 2020, "Final Rule Regarding 10 CFR  
50.55a(b)(2)(xxvi), 10 CFR Part 50, RIN 3150-AJ74" (ML20198M552)

2. EPRI letter dated May 28, 2020, "Final Rule Regarding 10 CFR  
50.55a(b)(2)(xxvi), 10 CFR Part 50, RIN 3150-AJ74" (ML20204A964)

Dear Mr. Vogan, Mr. Frederick, and Mr. Patten:

The purpose of this letter is to respond to the referenced American Society of Mechanical Engineers (ASME) and Electric Power Research Institute (EPRI) letters, related to the pressure testing condition in 10 CFR 50.55a(b)(2)(xxvi), as updated, in the final rule incorporating by reference the ASME, 2015-2017 Code Editions (85 FR 26540). In your letters, you requested clarification on whether the pressure testing condition addressed in 10 CFR 50.55a(b)(2)(xxvi), as updated, would prohibit the use of the pressure testing exemptions in IWA-4540(b) and whether the updated condition requires pressure testing of mechanical joints when only bolting is replaced.

The updates to 10 CFR 50.55a(b)(2)(xxvi) and the issues discussed in your letters were discussed during public meetings with representatives from the nuclear industry that were held on June 4, 2020 and June 25, 2020. The meeting summaries can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession Nos. ML20163A609 and ML20189A286, respectively. In summary, the NRC staff presented the history of the 10 CFR 50.55a(b)(2)(xxvi) condition evolution and the NRC staff's intent for both the original and revised condition; clarified and confirmed that the pressure testing exemptions in IWA-4540(b), including bolts as addressed by IWA-4540(b)(10) in the 2017 Edition of the ASME Code, continue to apply under the updated 10 CFR 50.55a(b)(2)(xxvi); and reiterated that licensees/applicants shall continue to meet the requirements of their current ISI Code of record. For additional details, please refer to the meeting summaries.

Thank you for your inquiry. The NRC appreciates the open dialogue and welcomes future correspondence as the NRC continues to support the development, revision, and use of ASME Codes and Standards and its incorporation by reference in 10 CFR 50.55a. If you have questions or concerns, please contact me at [Louise.Lund@nrc.gov](mailto:Louise.Lund@nrc.gov) or 301-415-0377, or David Rudland at [David.Rudland@nrc.gov](mailto:David.Rudland@nrc.gov) or 301-415-1896.

Sincerely,

*/RA/*

Louise Lund, NRC Standards Executive  
Office of Nuclear Regulatory Research

cc:

Thomas Vogan ([tomvogan45@gmail.com](mailto:tomvogan45@gmail.com))

Allyson Byk ([Byka@asme.org](mailto:Byka@asme.org))

Gregory Frederick ([gfrederi@epri.com](mailto:gfrederi@epri.com))

Dan Patten ([dpatten@firstenergycorp.com](mailto:dpatten@firstenergycorp.com))

SUBJECT: PRESSURE TESTING CONDITION IN 10 CFR 50.55A(B)(2)(XXVI) (85 FR 26540) DATED JULY 27, 2020

**DISTRIBUTION:**

L. Lund, RES  
A. Bradford, NRR  
M. Rahimi, RES  
D. Rudland, NRR  
M. Benson, RES  
R. Roche-Rivera, RES  
R. Iyengar, RES

**ADAMS Package Accession No.: ML20198M551, ML20209A106 (Letter) \*via-email**

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