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OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

DOCKET NUMBER
PROPOSED RULE **PR 50**
(66FR 40626)

October 17, 2001

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

GL01-020

ATTN: Rulemakings and Adjudications Staff

**REQUEST FOR COMMENTS ON THE PROPOSAL TO AMEND
REQUIREMENTS FOR INDUSTRY CODES AND STANDARDS**

Dear Ms. Vietti-Cook,

Virginia Electric and Power Company (Dominion) appreciates the opportunity to provide comments on the proposed amendment to 10 CFR 50.55a concerning industry codes and standards, which appeared in the Federal Register, volume 66, number 150, page 40626, on August 3, 2001.

Dominion endorses the comments provided separately by the Nuclear Energy Institute (NEI) on behalf of the industry. Additionally, we have attached several comments for your consideration on this proposed amendment.

If you would like further information, please contact either:

Mr. Les Spain les_spain@dom.com, or (804) 273-2602 or

Mr. Don Olson don_olson@dom.com or (804) 273-2830

Respectfully,

A handwritten signature in black ink, appearing to be "S. Sarver", written over a horizontal line.

Stephen P. Sarver, Director
Nuclear Licensing & Operations Support

Attachment

Template=SECY-067

SECY-02

Comments on Proposed Rule Making on 10 CFR 50.55a

COMMENT NUMBER	PAGE	PARAGRAPH	COMMENT	PROPOSED REVISION
1	40640	50.55a(b)(2)(xxii)	<p>The proposed rule requires that annual training for UT personnel be administered in accordance with Paragraph 4240 of Appendix VII of the 1998 Edition of ASME Section XI. Paragraph 4240 of Appendix VII of the 1998 Edition of ASME Section XI requires 10 hours of training on an annual basis to impart knowledge of new developments, material failure modes, and any pertinent technical topics as determined by the employer. It is felt that the training specified by the Paragraph 4240 of Appendix VII of the 1998 Edition of ASME Section XI is too broad in nature and will not result in a uniform standard throughout the industry for maintaining the proficiency of UT examination personnel. It is felt that training of this nature is not an effective application of our training resources. It is Dominion Virginia Power's position that annual training should center on maintaining the proficiency of UT examination personnel to detect and size flaw indications. Training should consist of an organized program to reinforce and evaluate the trainee's practical skills. This is a simple standard that can be applied uniformly. We agree with the Commission's position that there should be no allowance to substitute review of past data or simulated training for hands-on training.</p>	<p>It is proposed that paragraph 50.55a(b)(2)(xxii) be changed to require that UT technicians who will be performing examinations in accordance with Appendix VIII of Section XI receive 8 hours of hands-on training on specimens that contain actual flaws within six months of working on the outage. Further it is proposed that the hands-on training cover the techniques that are expected to be used by the UT technician during the upcoming outage.</p>

2	40640	50.55a(b)(2)(xxi)(A)	The proposed rule would reinstate the requirement to perform volumetric examinations of pressurizer and SG nozzle inner-radius sections.	Delete the paragraph.
3	40633	2.4	<p>In comments pertaining to ASME OM Code ISTC-3540, the NRC stated that, "Operating experience has revealed that a manual valve can become incapable of operating when not exercised or maintained over a long period of time. See for example, NRC Information Notice 86-61 (July 28, 1986), 'Failure of Auxiliary Feedwater Manual Isolation Valve.'" A review of IN 86-61 showed that the valve in question failed as a "result of a lack of any maintenance on this valve during the operational life of the plant, about 10-12 years. The lack of a preventive maintenance program resulted in the valve being inadequately lubricated, which cause the valve to seize." Reference was made to two other valves that had failed previously. However, no information was given concerning maintenance.</p> <p>The reference to IN 86-61 as a basis for "operating experience" is misleading. The valve in IN 86-61 had received no maintenance over a period of 10-12 years. The new Code has a test interval of 5 years. During the preparation of ISTC-3540, the ISTC Working Group surveyed utilities to determine if 5 years was a reasonable test interval. It was concluded from the survey that failure of manual valves is rare and a 5 year test interval</p>	The proposed revision should be withdrawn

			<p>is appropriate.</p> <p>Within the Code, the precedent has been established for test intervals longer than 2 years. In ISTC, Appendix I, Class 1 safety and relief valves are tested once every 5 years and Class 2 safety and relief valves are tested once every 10 years. Appendix J, Option B allows leak rate test intervals up to 5 years.</p>	
4	40640	50.55a(b)(3)(vi)	See comments above.	The proposed revision should be withdrawn.
5	40627	10 CFR 50.55a(g)(6)(ii)(B) (1)	IWL containment program is on a 5-year (60 month) interval.	Apparently the NRC wants the IWL programs to update on a 120 month interval, however since the Code uses interval terminology for IWL, a parenthetical addition is necessary clarifying that two IWL Code intervals would make up the 120 month interval used for program updates.
6	40627	10 CFR 50.55a(g)(6)(ii)(B) (1)	The proposed rule clarifies the interval start date (first 120-month interval). It must coincide with the start of the first containment inspection. This position appears to change the original rule, which allowed 5 years to develop and complete the first period examination requirements. EPRI, representing the industry in their document GC-110698, interpreted the interval to allow a 5 year first period that would be followed by the normal 4 year second period, and the normal 3 year third period (position 1, page 5-1). The new rule appears to count the first five years as a time period to develop your program and perform the first period examinations, but	None proposed. Not sure how to fix since the rule will not be finalized for a while. Second period exams would be scheduled to meet the second period time requirements under both interpretations

			<p>starts the interval coincident with the examination start date. It is not clear if the original industry position was in error or if the proposed rule is a change and not a clarification. The net affect is that the second period (or interval IWL) start date is in question and that impacts when examinations should be performed.</p>	
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