"NR" Task Group Meeting

Monday, January 9th, 2017 San Diego, California

Minutes

1. Call to Order

Chair Mr. Paul Edwards called the meeting to order at 9:05am local time.

2. Introductions/Announcements

Those in attendance introduced themselves. A WebEx meeting was set up for those not able to attend in person. The following task group members participated via WebEx:

- Mr. Tom Roberts
- Mr. Paul Fisher
- Mr. Ed Maloney
- Mr. Brian Toth

There were no announcements.

3. Approval of Agenda

The agenda was approved as distributed by a unanimous vote of the NR Task Group.

4. Approval of Minutes Dated July 18th, 2016

The minutes for the meeting of July 18th, 2016 were approved as distributed by a unanimous vote of the NR Task Group.

5. Action Items for Discussion

NOTE: Attachments are uploaded on the NBIC Cloud (<u>www.nbicshare.org</u>) -> January 2017 folder -> NR Task Group folder

a. 2017 Edition Approved Items

The task group reviewed all approved changes that related to the NR program for the 2017 edition of the NBIC. This was meant as a review to ensure all changes to the code accurately reflected the wishes of the NR task group. Approved action items NB15-

1201, NB15-1203, NB15-1204, NB15-1407, NB15-1408, NB15-1409, NB16-0601, NB16-0602, NB16-0604, NB16-0605, NB16-0606, and NB16-1501 were reviewed.

b. Open Items

- i. NB16-0603 The purpose of this item is to revise Part 3, Supplement 9 for repairs to nuclear safety related pressure relief devices. This action was previously letter balloted to SC PRDD and received five comments/negatives. MR. Joe Ball provided a detailed history of the item. He stated that this item is necessary because most nuclear plants have safety valves not stamped or properly certified. The task group agreed to update the proposal to address the letter ballot comments. After discussion, this proposal was approved by a unanimous vote of the NR Task Group to be moved to SC PRD.
- ii. NB16-0608 The purpose of this item is to address nuclear QA program requirements for owners and Certificate Holders functioning under earlier editions of NQA-1, or limited by other requirements (Section XI, Appendix B or regulatory requirements). Mr. Clay Smith was assigned as the project manager. This action was discussed by the task group, and they confirmed that action was required on this item. A proposal should be ready for the July 2017 NR Task Group meeting.
- iii. NB16-0609 The purpose of this item is to add/correct calibration and testing requirements for accredited organizations using Category 1, 2, and 3 quality programs. It was agreed to use the same wording from ASME Section III NCA-3126 in NBIC Part 3, 1.8.6.2, 1.8.7.2, and 1.8.8.2. Mr. Chuck Withers was assigned as project manager. A proposal should be ready for the July 2017 NR Task Group meeting.
- iv. NB16-0610 The purpose of this item is to review scope statements for NR Category 3 in regards to other ASME codes of construction (i.e. Section VIII, B31.7, etc.). A revision to NBIC Part 3, 1.8.2 was proposed. After discussion, this proposal was approved by a unanimous vote of the NR Task Group to be moved to SG Repairs and Alterations.

6. Promoting "NR" Accreditation Program - NRC Recognition

Mr. Withers gave a progress report. He stated that a formal request for consideration of the NR Program had been sent to the United States NRC and the Canadian Nuclear Safety Commission. Discussion was held about the progress towards NRC acceptance. A report will be presented at the July 2017 meeting.

7. New Business

During task group discussion, the following new action items were opened:

- a. NB17-0701 The purpose of this item is to add wording in NBIC Part 3, 1.8.1 to ensure the NR Program meets the requirements of NQA-1, Part 2, 2.1.4 and 2.7. Mr. Clay Smith was assigned as project manager.
- NB17-0702 The purpose of this item is to review references to ASNT ACCP in NBIC Part 3, 1.8.7.2. Section III does not allow the use of ACCP but Section XI does. The item aims to bring the NBIC in accordance with the ASME codes.
- c. IN17-0101 Mr. Tom Roberts presented a request for interpretation of the NBIC. The inquiry question seeks to clarify and address audits of NR Certificate Holder's QA Program performed by the Authorized Nuclear Inspector Supervisor. This item was discussed and the task group decided it was not currently addressed in the NBIC. A proposed reply should be ready for the July 2017 NR Task Group meeting.
- d. Review of forms and guides Mr. Withers informed the task group members that this item will be continual action for improvement based on feedback from Certificate Holders.

8. Future Meetings

The NR Task Group will meet at the National Board Headquarters in Columbus, Ohio on Monday, July 17th, 2017 at 9:00am.

9. Adjournment

The meeting was adjourned at 3:05pm local time.

ATTACHMEN Attachment 1

NR Task Group Attendance Sheet - 1/9/17							
Name	Company	Phone Number	Email	Signature	Attend Rec.?	Guest?	
Paul Edwards	WECTEC	(617) 589-5677	edwardsp4@asme.org	Paul D Edwards	V		
Benjamin Schaefer	AEP	614-949-3715	bschaefer@aep.com	Migh			
Clayton Smith	Fluor		clavton.t.smith@fluor.com				
Bob Wielgoszinski	HSB	(860) 722-5064	robert wielgoszinski@hsbct.com	Bob Wielgoninski			
Chuck Withers	National Board	(614) 888-8320	cwithers@nationalboard.org	Charl Strucks	V		
Tom Roberts	MPR		troberts@mpr.com	Telecont			
Paul Fisher	нѕв		paul.fisher@hsbct.com	Telebort	2		
Edward Maloney	PSEG		edward.maloney@pses.com	teleent	7am		
Kerri Kavanagh	NRC	3014153743	kerri.kavanagh@nrc.gov	Kulyn	70		
Richard McIntyre	NRC	301 415-3215	richard.mcintyre@nrc.gov	Parla Mate		/	
Bryan Toth	WECTEC		tothbm@westinghouse.com	relecon	مسد		
Joe Ball	National Board	(614) 888-8320	jball@nationalboard.org	Joseph Ball 1	~		
Gary Scribner	NBBOUT	614888315	O GSEr BAR QUARONAL	poter of W			
Brad Besserm	NB	6148888300	bbeserna ancton board on	bil an			
Diaz	NRC	301-415 -2228	yamir diaz-castillo	12210			
DAN LANCASTER PE	American Greense Power	-5821	alp. Com	ta - 1			
John Burfel	STATE OF MAINE	207-592	john.h.burpee e maine.gov	John H Burge		1	

Comments for Ballot: NB16-06-03				
Marek,Daniel voted: Abstention 10/31/2016 9:18:35 AM	Thakor mentions an email from Joe Ball about the proposal, is that email available for review?			
Patel,Thakor voted: Approve 10/19/2016 2:00:41 PM	Joe Ball's e-mail provides detail explanation of the proposal and clarifies my concerns. Thanks.			
Patel,Thakor voted: Disapprove 10/18/2016 10:34:21 AM	Change 'Pressure Relief Devices' to Pressure Relief Valves' in title of Supplement 9 as rupture disks in rupture disk holders is not considered the repair activity under the scope of this supplement. Classification of Group 1, Group 2 and Group 3 are not necessary as they are not used anywhere else in Part III book. Change '0t' to 'to' in last sentence of Group 2 which is editorial change. Delete the first sentence of paragraph S9.3 f) which refers to 'rerating of the device.' 'Rerating' in index at the back of the Part III refers to 'alteration'. The 'Alteration' is not applicable to pressure relief devices. Existing Supplement 9 authorizes the repairs of Pressure Relief Valves whose capacity is certified by National Board. Group 3 includes the Pressure Relief Valves which are not capacity certifies by National Board or constructed to codes or standards other than ASME.			
Cox,Alton voted: Disapprove 10/5/2018 4:12:44 PM	This appears to be an attempt to permit the repair of Safety Related PRVs that are not "NV" Stamped under the National Board NR Program. The term "Nuclear Safety Related" is a made up phrase the appears once in 13 ASME Sections regarding Nuclear Service. That one use is related to coatings, not PRVs. The entire proposal attempts to place Sec VIII (Balance of Plant) PRVs that may be deemed "Safety Related" into a different category from other Sec VIII PRVs by making them "Nuclear Safety Related." I disagree. Reference Document: NB16-0603 7-18-16 jac.pdf			
Cammeresi, Sid voted: Disapprove 10/3/2018 5:48:18 PM	I'm voting "Disapprove" only to ask a question. It was my understanding that NB is moving away from the idea of certificate holders using actual stamps and going more toward "applying the symbol." This is already being done in the T/O program and supposed to spill over into other certificates. If that is true then this new language is very heavily laden with use of the word "stamp" S9.2(a) obtain VR Certificate of Authorization and stamp. What happens if the stamp goes away and apply the symbol comes in to play? Also is this not implied if one has a certificate they also have a stamp? Same in (b) S9.3(a) "stamped with the NR stamp"?? Are we moving away from stamps because of expense and difficulty in keeping tabs on them? Just asking.			

SUPPLEMENT 6

PROCEDURES FOR REPAIRS TO ASME "NV" STAMPED PRESSURE RELIEF DEVICES OF NUCLEAR SAFETY RELATED PRESSURE RELIEF VALVES

S6.1 <u>SCOPE</u>

ASME Code "NV" Class 1, 2, or 3 stamped pressure relief devices, Nuclear safety related pressure relief valves and power operated pressure relief valves which have been capacity certified by the National Board, may be repaired provided the following requirements are met.

S6.2 DEFINITIONS

<u>Safety Related</u> – As used in this supplement and when applied to nuclear power plants, safety related means a structure, system, or component or part thereof that affects its safety function necessary to assure:

- a) The integrity of the reactor coolant pressure boundary;
- b) The capability to shut down the reactor and maintain it in a safe shutdown condition; or
- c) The capability to prevent or mitigate the consequence of accidents which could result in potential offsite exposures.

S6.3 NUCLEAR SAFETY RELATED VALVE GROUPS

<u>These rules classify nuclear safety related pressure relief valves into three groups based upon the original code of construction and capacity certification status.</u>

<u>Group 1: ASME Section I and Section VIII pressure relief valves used in nuclear safety related service with National Board capacity certification.</u>

Group 2: ASME Section III NV stamped Class 1, 2, or 3 pressure relief valves with National Board capacity certification.

Group 3: Pressure relief valves not addressed in Group 1 or Group 2. This group shall include pressure relief valves without National Board capacity certification and/or pressure relief valves constructed to codes or standards other than ASME (see NBIC Part 3, Category 3).

The term pressure relief valve includes power operated pressure relief valves. Replacement of rupture disks in rupture disk holders or in systems is not considered a repair activity under the scope of this supplement.

S6.42 ADMINISTRATIVE PROCEDURES

- a) The repair organization shall hold obtain a valid "VR" Certificate of Authorization and stamp.
- b) The repair organization shall obtain a National Board "NR" *Certificate of Authorization*-and stamp. The requirements for said certificate and stamp-includes, but are is not limited to the following. The repair organization shall:
 - 1) Maintain a documented quality assurance program that meets the applicable requirements of NBIC Part 3, 1.8. This program shall also include all the applicable requirements for the use of the "VR" stamp;

- 2) Have a contract or agreement with an <u>Authorized</u> Inspection Agency <u>that is qualified in accordance with the requirements of ASME QAI-1, Qualifications for Authorized Inspection</u> to provide inspection of repaired <u>nuclear "NV" stamped</u> pressure relief <u>devices valves</u> <u>by Inspectors who have been qualified in accordance with the requirements of ASME QAI-1, Qualifications for Authorized Inspection;</u>
- 3) Successfully complete a survey of the quality assurance program and its implementation. This survey shall be conducted by representatives of the National Board, the Jurisdiction wherein the applicant's repair facilities are located, and the applicant's Authorized Inspection Agency. Further verification of such implementation by the survey team may not be necessary if the applicant holds a valid ASME "NV" certificate and can verify by documentation the capability of implementing the quality assurance program for repair of "NV"-stamped pressure relief devicesvalves, covered by the applicant's ASME "NV" certificate.
- c) The application of the "NR" *Certificate of Authorization* and stamp shall clearly define the scope of intended activities with respect to the repair of <u>Section III, "NV"-stamped nuclear</u> pressure relief <u>devices valves</u>.
- d) Revisions to the quality assurance program shall be acceptable to the Authorized Nuclear Inspector Supervisor and the National Board before being implemented.
- e) The scope of the "VR" *Certificate of Authorization* shall include repair of "NV"-stamped nuclear pressure relief devices valves (denoted on the VR Certificate as Section III).
- f) Verification testing of valves repaired by the applicant shall not be required provided such testing has been successfully completed under the applicant's "VR" certification program for the applicable test fluids.
- g) A survey of the applicant for the "VR" *Certificate of Authorization* and endorsement of the repair of "NV"-stampednuclear pressure relief devices walves may be made concurrently.

h) S6.53 GENERAL RULES

- a) Group 1 and Group 2 pressure relief valves ASME Code Section III, "NV"-stamped pressure relief devices, which have been repaired in accordance with these rules, shall be stamped with both the "VR" and "NR" stamps. They shall be classified as either NR Category 1 or Category 2 as applicable. Group 3 pressure relief valves which have been repaired in accordance with these rules shall be stamped with the "NR" stamp. They shall be classified as either NR Category 2 or Category 3 as applicable.
- b) The "VR" and "NR" stamps shall be applied only to "NV" stamped (Class 1, 2, or 3) National Board capacity certified nuclear safety related pressure relief devices valves that have been disassembled, inspected, and repaired as necessary, such that the valves' condition and performance are equivalent to the standards for new valves.
- c) All measuring and test equipment used in the repair of pressure relief devices valves shall be calibrated against certified equipment having known valid relationships to nationally recognized standards.
- d) Documentation of the repair of "NV"-stampednuclear safety related pressure relief devices valves shall be recorded on the National Board Form NVR-1, Report of Repair/ Replacement Activities for Nuclear Pressure Relief Devices, in accordance with the requirements of NBIC Part 3, 1.8. The original code of construction and capacity certification status shall be identified on the NVR-1 form.
- e) When an ASME <u>"V", "UV"</u> or "NV" stamped pressure relief device requires a duplicate nameplate because the original nameplate is illegible or missing, it may be applied using the procedures of NBIC Part 3, 5.12.5 provided

concurrence is obtained from the Authorized Nuclear Inspector and Jurisdiction. In this case the nameplate shall be marked <u>"SEC I"</u>, "SEC. III", or <u>"SEC VIII"</u> to indicate original ASME Code stamping.

- f) Repair activities for pressure relief devices shall not include rerating of the device. Set pressure changes within the range of the valve manufacturer's capacity certification and the design pressure of the valve (see 4.7.3) are permitted, provided the new set pressure and capacity rating are reconciled with the design of the system where the device will be used. Set pressure changes are not considered to be rerating.
- g) Conversions of pressure relief devices valves as described in 4.2 b) are permitted as part of repair activities.
- h) Set pressure changes or conversions of pressure relief devices shall be described in the "Remarks" section of Form NVR-1.

NB16-0610 NR Task Group 1-9-17

1.8.2 GENERAL

a) An organization applying for an "NR" *Certificate of Authorization* shall have a written Quality Assurance Program (QAP) that details the specific requirements to be met based on the intended category of activities selected by that organization as described below and shown in Table 1.8.2. Controls used, including electronic capabilities, in the Quality Assurance Program shall be documented in a Quality Assurance Manual (QAM). Controls required to be included within the QAM shall include who, what, when, where, why and how with an understanding that the how can be a reference to an implementation procedure or instruction. Quality activities to be described in the Quality Assurance Program are identified in Section 1.8.5 of this part. Applicants shall address all requirements in their Quality Assurance Program based on the category of activity and scope of work to be performed (organization's capabilities) to which certification is requested.

1) Category 1

Any ASME <u>Section III</u> Code certified item or system requiring repair/replacement activities irrespective of physical location and installation status prior to fuel loading.

2) Category 2

After fuel loading, any item or system under the scope of ASME Section XI requiring repair/replacement activities irrespective of physical location. Based on regulatory or jurisdictional acceptance, Category 2 may be used prior to fuel loading.

3) Category 3

Items constructed to codes or standards other than ASME other than those covered by Category 1 or Category 2, requiring repair/replacement activities irrespective of physical location, installation status and fuel loading.

b) Repair organizations performing repairs of pressure relief devices in nuclear service shall meet the additional requirements of NBIC Part 4, Section 4 and NBIC Part 4, Supplement 6.

IN17-0101 Roberts 1-9-17

ANIS Audit of NR Certificate holders QA Program.

Applicability:

NB-23, National Board Inspection Code, Part 3, Repairs and Alterations, 2013 Edition including the 2013 Addenda through the 2015 Edition.

Background

NBIC, Part 3, Section 1.8.7.2. r) contains provisions permitting a Certificate Owner's annual audit to be limited to areas of responsibility required to be continually maintained such as training, audits, organizational structure, QA Program revisions, etc. when no (physical) work is performed.

ANI responsibilities are provided within NBIC, Part 3, Section 1.87.2. s). However, there are no equivalent provisions limiting scope of the annual ANIS audit of the Certificate Owner's program.

Inquiry:

May the certificate owner's audit responsibilities be extended to limit the ANIS audit to areas of responsibility required to be continually maintained such as training, audits, organizational structure, QA Program revisions, etc. when no (physical) work is performed.

Proposed Reply:

Yes.

Committee Proposal:

Inquiry:

If an NR Certificate of Authorization holder is considered inactive, where there is no current repair or replacement work ongoing, is it required that the ANIS audit areas other than those functions required to be continually maintained such as training, audits, organizational structure, QA Program revisions, etc.

Proposed Reply:

No, however the ANIS has the organizational freedom to audit any portion of the QA Program as necessary to verify compliance.