

NBIC Task Group "NR" Rewrite  
Monday, July 16, 2012  
Columbus, Ohio

## MINUTES

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### 1. Call to Order

The Chairman of the NBIC, Mr. Terry Parks, called the meeting to order at 8:45 A.M. in the absence of Mr. Paul Edwards-Chairman.

James McGimpsey acting as Task Group Secretary requested a motion from the floor to nominate an acting Chairman for this Task Group meeting.

Mr. Bob Wielgozinski was elected Chairman unanimously.

### 2. Introductions /Announcements

The Secretary made the announcements concerning the NBIC weekly meeting schedule and the Wednesday evening outing.

### 3. Review Membership/Charter-see Attachment 1

There was motion to appoint Mr. Paul Fisher of HSB-CT to the NR Rewrite Task Group.

The motion was unanimously approved.

The Charter for the Task Group was reviewed.

### 4. Review CC N-801-1, CC N-802 will be annulled- see Attachment 2

CC N-801-1 was reviewed and the Task Group agreed that all interpretations for NR and NVR need to be reviewed by Task Group members.

### 5. Review Survey results from current "NR" Certificate Holders- see Attachment 3

Mr. Terry Parks presented the results of the survey and the Task Group voted to send a letter to current NR Certificate Holders and NR applicants pending, previewing the scope of changes and another complete survey.

### 6. Discuss Scope and "NR" QA Program matrix- see attachment 4

Mr. Pat Nightengale explained the matrix of Table 1.8.2-1 and the Task Group discussed how PRD's under the NR and VR programs are affected.

The Task Group voted unanimously to delete ASME Sec XI, IWA-4142(a)(2) under Category 2, Organizations other than Owner in Table 1.8.2-1 and insert NQA-1 Part 1 in its place.

#### 7. Plan and Perform work assignments.

Mr. Pat Nightengale assigned the following members of the Task group to review ASME NQA-1, 10 CFR 50, Appx. B, ASME Sec XI, IWA-1400, IWA 4142.1 (a), IWA and IWA-4134 and Table 1.8.2-1 as to the proposed NR Quality Assurance Program requirements proposal:

Walter Beach and Clay Smith- Items 1,2,3,4, and 17 in NQA-1

Ed Maloney and Tom Roberts- Items 5, 6, 7, and 8 in NQA-1

Ben Schaefer and Bob Wielgozinski- Items 9, 10, 11, 12, and 18 in NQA-1

Paul Fisher and Merle Minick- Items 13, 14, 15, and 16 in NQA-1

#### 8. Review Group Comments

The Task Group voted unanimous to set November 1, 2012 as the deadline to submit their comments to the National Board, Attn: C. Withers. The National Board will compile the comments and forward them to the Task Group Members by December 1, 2012.

The Task Group discussed adding Parts II and III not NQA-1 to Table 1.8.2-1. and how the Task Group's work will influence Small Modular Reactors (SMR) in the future.

#### 9. Next meeting

January 2013- Mobile, Alabama

#### 10. Adjournment

The meeting was adjourned at 1:15 P.M.

**Attendance List TG on NR**

**Meeting Date: July 17, 2012**

<p><b>Paul Edwards</b>                  Director, ASME Programs                  Stone &amp; Webster, Inc.                  100 Technology Center Drive                  Stoughton, MA 02072</p> <p>Ph: 617-589-5690                  Fax: 617-589-1792                  E-mail: <a href="mailto:paul.edwards@shawgrp.com">paul.edwards@shawgrp.com</a></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>PE</u>                  Initial</p>	<p><b>Chuck Withers</b>                  National Board of Boiler and Pressure                  Vessel Inspectors                  1055 Crupper Ave.                  Columbus, OH 43229</p> <p>Ph: 614-888-8320                  Fax: 614-847-1828                  E-mail: <a href="mailto:cwithers@nationalboard.org">cwithers@nationalboard.org</a></p>	<p>Attended:                  Yes <input type="checkbox"/>                  No <input checked="" type="checkbox"/></p> <p><u>FW</u>                  Initial</p>
<p><b>Robert V. Wielgoszinski</b>                  Hartford Steam Boiler I &amp; I of CT.                  One State Street                  Hartford, CT 06103</p> <p>Ph: 860-722-5064                  Fax: 860-722-5705                  E-mail: <a href="mailto:Robert_wielgoszinski@hsbct.com">Robert_wielgoszinski@hsbct.com</a></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>RW</u>                  Initial</p>	<p><b>Pat Nightengale</b>                  National Board of Boiler and Pressure                  Vessel Inspectors                  1055 Crupper Ave.                  Columbus, OH 43229</p> <p>Ph: 614-888-8320                  Fax: 614-847-1828                  E-mail: <a href="mailto:pnighten@nationalboard.org">pnighten@nationalboard.org</a></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>PN</u>                  Initial</p>
<p><b>Ed Maloney</b>                  PSEG Nuclear  <i>One Alloway Creek Neck Rd.                  Hanrocks Bridge, NJ 08038</i></p> <p>Ph: <i>856-339-1350</i>                  Fax: <i>N/A.</i>                  E-mail: <a href="mailto:edward.maloney@pseg.com">edward.maloney@pseg.com</a></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>EM</u>                  Initial</p>	<p><b>Richard McIntyre</b>                  NRC</p> <p>Ph:                  Fax:                  E-mail: <a href="mailto:Richard.McIntyre@nrc.gov">Richard.McIntyre@nrc.gov</a></p>	<p>Attended:                  Yes <input type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>RM</u>                  Initial</p>
<p><b>Merle Minick</b>                  Consultant</p> <p>Ph: <i>412-741-4408</i>                  Fax: <i>412-741-4408</i>                  E-mail: <a href="mailto:bmminick@comcast.net">bmminick@comcast.net</a></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>MM</u>                  Initial</p>	<p><b>Tom Roberts</b>                  MPR <i>Associates Inc</i></p> <p><i>Cell 609-560-1778</i></p> <p>Ph: <i>703-519-0513</i>                  Fax: <i>703-519-0224</i>                  E-mail: <a href="mailto:troberts@mpr.com">troberts@mpr.com</a></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>TR</u>                  Initial</p>
<p><b>Clayton Smith</b>  <i>Technical Services Director                  Fluor Nuclear Power -                  100 Fluor Daniel Dr.                  Greenville SC 29607                  OFFICE 864-517-1357                  Cell <del>770</del> 856-0294</i></p> <p>e-mail: <i>clayton.smith@fluor.com</i></p>	<p>Attended:                  Yes <input checked="" type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>CS</u>                  Initial</p>	<p><b>Rick Swayne</b></p>	<p>Attended:                  Yes <input type="checkbox"/>                  No <input type="checkbox"/></p> <p><u>RS</u>                  Initial</p>

## Attendance List TG on NR

Meeting Date: July 17, 2012

<p><b>Wally Norris</b></p> <p>NRC</p> <p>Address:</p> <p>City/State/Zip:</p> <p>Ph: Ext.</p> <p>Fax:</p> <p>E-mail:</p>	<p><b>Kerri Kavanagh</b></p> <p>NRC</p> <p>Address:</p> <p>City/State/Zip:</p> <p>Ph: Ext.</p> <p>Fax:</p> <p>E-mail: kerri.kavanaugh@nrc.gov</p>
<p>Name: Joseph Ball</p> <p>Company: NBBPVI</p> <p>Address:</p> <p>City/State/Zip:</p> <p>Ph: Ext.</p> <p>Fax:</p> <p>E-mail: jball@nationalboard.org</p>	<p>Name: A. Thomas Roberts</p> <p>Company: MPR Associates Inc</p> <p>Address: 320 King Street</p> <p>City/State/Zip: Alexandria, VA</p> <p>Ph: 703-519-0513 Ext. — Cell 609-560-1178</p> <p>Fax: 703-519-0224</p> <p>E-mail: troberts@mpr.com</p>
<p>Name: Terry Parks</p> <p>Company: NBSI</p> <p>Address:</p> <p>City/State/Zip:</p> <p>Ph: Ext.</p> <p>Fax:</p> <p>E-mail: Tparks@nationalboard.org</p>	<p>Name: Walter Beach</p> <p>Company: Beach Technical Code Services</p> <p>Address: 574 Fieldstone Dr.</p> <p>City/State/Zip: Amherst, OH 44001</p> <p>Ph: 440 864-7800 Ext.</p> <p>Fax:</p> <p>E-mail: wgbeach@gmail.com</p>

# Attendance List TG on NR

Meeting Date: July 17, 2012

<p>Name: Benjamin Schaefer          Company: American Electric Power (AEP)          Address: 1 Riverside Plaza          City/State/Zip: Columbus, Ohio. 43215          Ph: 614-716-1843 Ext. NA          Fax: 614-716-1744          E-mail: bschaefer@aep.com</p>	<p>Name:          Company:          Address:          City/State/Zip:          Ph: Ext.          Fax:          E-mail:</p>
<p>Name: Paul FISHER          Company: HSBC-CT          Address: 2443 WARRENVILLE RD          SUITE 500          City/State/Zip: Lisle IL 60532          Ph: 630 955 5660 Ext.          Fax: 630 955 5642          E-mail: paul_fisher@hsbct.com</p>	<p>Name:          Company:          Address:          City/State/Zip:          Ph: Ext.          Fax:          E-mail:</p>
<p>Name:          Company:          Address:          City/State/Zip:          Ph: Ext.          Fax:          E-mail:</p>	<p>Name:          Company:          Address:          City/State/Zip:          Ph: Ext.          Fax:          E-mail:</p>

Approval Date: ~~December 23, 2010~~

new approval date here

Code Cases will remain available for use until annulled by the applicable Standards Committee.

The term "N-Stamp" is intended to include the "Certification Mark and appropriate Certification mark designator"

N-801-1

~~Case N-801~~  
**Rules for Repair of N-Stamped Class 1, 2, and 3 Components by Organization Other Than the N Certificate Holder That Originally Stamped the Component Being Repaired**  
Section III, Division 1

*Inquiry:* For the period of time between component N-stamping and the Owner's filing of the N-3 Data Report, what rules may be used for repairs performed by organizations other than the N Certificate Holder that originally stamped the component?

to N-Stamped Class 1, 2 or 3 components.

*Reply:* It is the opinion of the Committee that for the period of time between Component stamping and the Owner's filing of the N-3 Data Report, the following rules may be used for repairs by organizations other than the N Certificate Holder that originally stamped the component.

An N Certificate Holder other than the N Certificate Holder that originally stamped the component being repaired may perform repairs to the component in accordance with Section III under the following conditions:

(b) ~~(a)~~ The N Certificate Holder performing the repair shall review the component Design Specification and Design Report, stress analysis, or applicable design rules to determine the required repair parameters. This review shall be documented and certified by a Registered Professional Engineer (RPE). If this review results in a need to revise the Design Specification or Design Report, these documents shall be revised prior to completion of the Code Data Report described in this Case. When required, these revisions shall also be certified by an RPE. RPEs shall be qualified in accordance with the edition of Section III referenced in the Design Specification. Alternatively, the

RPE may be qualified in accordance with Appendix XXIII of the 2007 or later Edition of Section III, Division 1. The revision of any design documents shall be reconciled with the Design Report.

(c) ~~(b)~~ The N Certificate Holder performing the repair shall complete the repair under the provisions of the Section III Edition and Addenda required by the Design Specification.

(d) ~~(c)~~ The N Certificate Holder performing the repair shall document the repair on Code Data Report form N-10 and attach or reference supporting documentation to describe the repair. The certification of Data Report N-10 indicates that the N Certificate Holder performing the repair assumes responsibility for Code compliance of the repair as described in the Data Report.

(e) ~~(d)~~ Unless otherwise stated herein, as applicable, the component shall be subjected to pressure testing as required by NB-6000, NC-6000, ND-6000 following the repair. Where the component has already been installed, the hydrostatic test pressure would exceed the piping system test pressure requirements of the piping system in which the component is installed, and the component cannot be isolated for testing, the repair shall be tested to the piping system pressure test requirements. The test pressure shall be documented on the Code Data Report completed by the N Certificate Holder performing the repair.

(a) ~~(e)~~ The scope of the Certificate of Authorization for the organization performing the repair shall include construction of the type and Code class of the component to be repaired. (including the Quality Assurance Manual)

(f) The N Certificate Holder's QA program shall describe the controls for performing repair of N-stamped components. These controls shall include the requirements for materials, fabrication, examination, inspection, testing, certification and documentation of the repairs.

(g) All of the requirements of the Design Specification and the Code Edition and Addenda applicable to the construction of the component shall be met except for pressure testing which may be performed as described in (c).

2 The term Design Report shall be taken to mean Stress Report or Stress Analysis as appropriate to the edition of Section III for the component being repaired.

The Committee's function is to establish rules of safety, relating only to pressure integrity, governing the construction of boilers, pressure vessels, transport tanks and nuclear components, and inservice inspection for pressure integrity of nuclear components and transport tanks, and to interpret these rules when questions arise regarding their intent. This Code does not address other safety issues relating to the construction of boilers, pressure vessels, transport tanks and nuclear components, and the inservice inspection of nuclear components and transport tanks. The user of the Code should refer to other pertinent codes, standards, laws, regulations or other relevant documents.

CASE (continued)

~~N-801<sup>D</sup>~~  
N-801-1

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

(h) The use of this Case shall be documented on the Code Data Report completed by the N Certificate Holder performing the repair. In addition, the Code Data Report completed by the N Certificate Holder performing the repair shall be attached to the Data Report of the N Certificate Holder who originally stamped the component.

,or referenced on

,or shall be referenced on an attachment to the original Data Report

(i) Stamping of the repaired component by the N Certificate Holder performing the repair shall not be required.

(j) The Authorized Nuclear Inspector shall review plans for repairs conducted under this Case and perform required in-process inspections and a final review of the completed repair prior to signing the Code Data Report.

**FORM N-10 REPORT FOR REPAIRS TO STAMPED COMPONENTS\***  
As Required by the Provisions of Section III, Division 1, Code and Code Case ~~N-801~~ N-801-1

1. Owner \_\_\_\_\_ (Name) <sup>①</sup> Date \_\_\_\_\_ <sup>②</sup>  
 \_\_\_\_\_ (Address) Sheet <sup>③</sup> of \_\_\_\_\_  
 2. Plant \_\_\_\_\_ (Name) <sup>④</sup> Unit \_\_\_\_\_ <sup>⑤</sup>  
 \_\_\_\_\_ (Address) \_\_\_\_\_ <sup>⑥</sup>  
 (Repair Organization P.O. No., Job No., etc.)  
 3. Work Performed by \_\_\_\_\_ <sup>⑦</sup> N Symbol Stamp No. \_\_\_\_\_ <sup>⑧</sup>  
 \_\_\_\_\_ (Address) Expiration Date \_\_\_\_\_ <sup>⑨</sup>  
 4. (a) Section III Edition/Addenda and Class of component being repaired \_\_\_\_\_ <sup>⑩</sup>  
 (b) Section III Cases used in construction of component being repaired \_\_\_\_\_ <sup>⑪</sup>  
 (c) Section III Edition/Addenda and Class used for repair \_\_\_\_\_ <sup>⑫</sup>  
 (d) Section III Cases used for repair \_\_\_\_\_ <sup>⑬</sup>

5. Identification of Components Repaired

Name of Component Repaired	Name of Manufacturer	Manufacturer's Serial Number	National Board Number	Other Information	Year Built
<sup>⑭</sup>	<sup>⑮</sup>	<sup>⑯</sup>	<sup>⑰</sup>	<sup>⑱</sup>	<sup>⑲</sup>

6. Description of Work: \_\_\_\_\_ <sup>⑳</sup>  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

7. Tests Conducted: Hydrostatic  Pneumatic  System Leakage  Exempt  Other  Test Pressure \_\_\_\_\_ <sup>㉑</sup>

Attach supplemental pages as required.

\*Supplemental information in the form of lists, sketches, or drawings may be used, provided: (1) size is 8 1/2 in. X 11 in.; (2) information in items 1 through 6 on this Data Report is included on each sheet; and (3) each sheet is numbered and the number of sheets is recorded at the top of this form.

FORM N-10 (Back — Pg. 2 of 2)

- 8. Original Design Specification  
 Certified by \_\_\_\_\_ (22) \_\_\_\_\_ P.E. State \_\_\_\_\_ Reg. No. \_\_\_\_\_  
 Original Design Report  
 Certified by \_\_\_\_\_ (23) \_\_\_\_\_ P.E. State \_\_\_\_\_ Reg. No. \_\_\_\_\_
- 9. Revised Design Specification  
 Certified by \_\_\_\_\_ (24) \_\_\_\_\_ P.E. State \_\_\_\_\_ Reg. No. \_\_\_\_\_  
 Revised Design Report  
 Certified by \_\_\_\_\_ (25) \_\_\_\_\_ P.E. State \_\_\_\_\_ Reg. No. \_\_\_\_\_
- 10. Remarks \_\_\_\_\_ (26) \_\_\_\_\_

Upon completion, this Data Report Form and all attachment sheets shall be attached to the original Data Report for the component receiving the described repair.

**CERTIFICATE OF COMPLIANCE**

I certify that the statements made in this report are correct and that this repair conforms to the requirements of Case ~~N-801~~ and the Case required provisions of ASME Section III, Division 1. Further, I certify that the repair described in this Data Report remains in compliance with the Design Specification and Design Report described above, or, if necessary, the Design Specification and Design Report have been revised in accordance with the requirements of ASME Section III, Division 1.

N-Type Symbol Stamp \_\_\_\_\_ N \_\_\_\_\_ (27) \_\_\_\_\_

Certificate Of Authorization No. \_\_\_\_\_ (28) \_\_\_\_\_ Expiration Date \_\_\_\_\_

Signed \_\_\_\_\_ (29) \_\_\_\_\_ Date \_\_\_\_\_  
 (Representative of Organization Performing Repair)

N-801-1

**CERTIFICATE OF INSPECTION**

I certify that the statements made in this report are correct and that this repair conforms to the requirements of Case ~~N-801~~ of ASME Section III, Division 1.

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and employed by \_\_\_\_\_ (30) \_\_\_\_\_ of \_\_\_\_\_ (31) \_\_\_\_\_, and state to the best of my knowledge and belief, the Certificate Holder has performed the repair on this component in accordance with Case ~~N-801~~ and the Case required provisions of the ASME Code, Section III, Division 1.

By signing this certificate neither the inspector nor his employer makes any warranty, expressed or implied, concerning the component described in this Data Report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

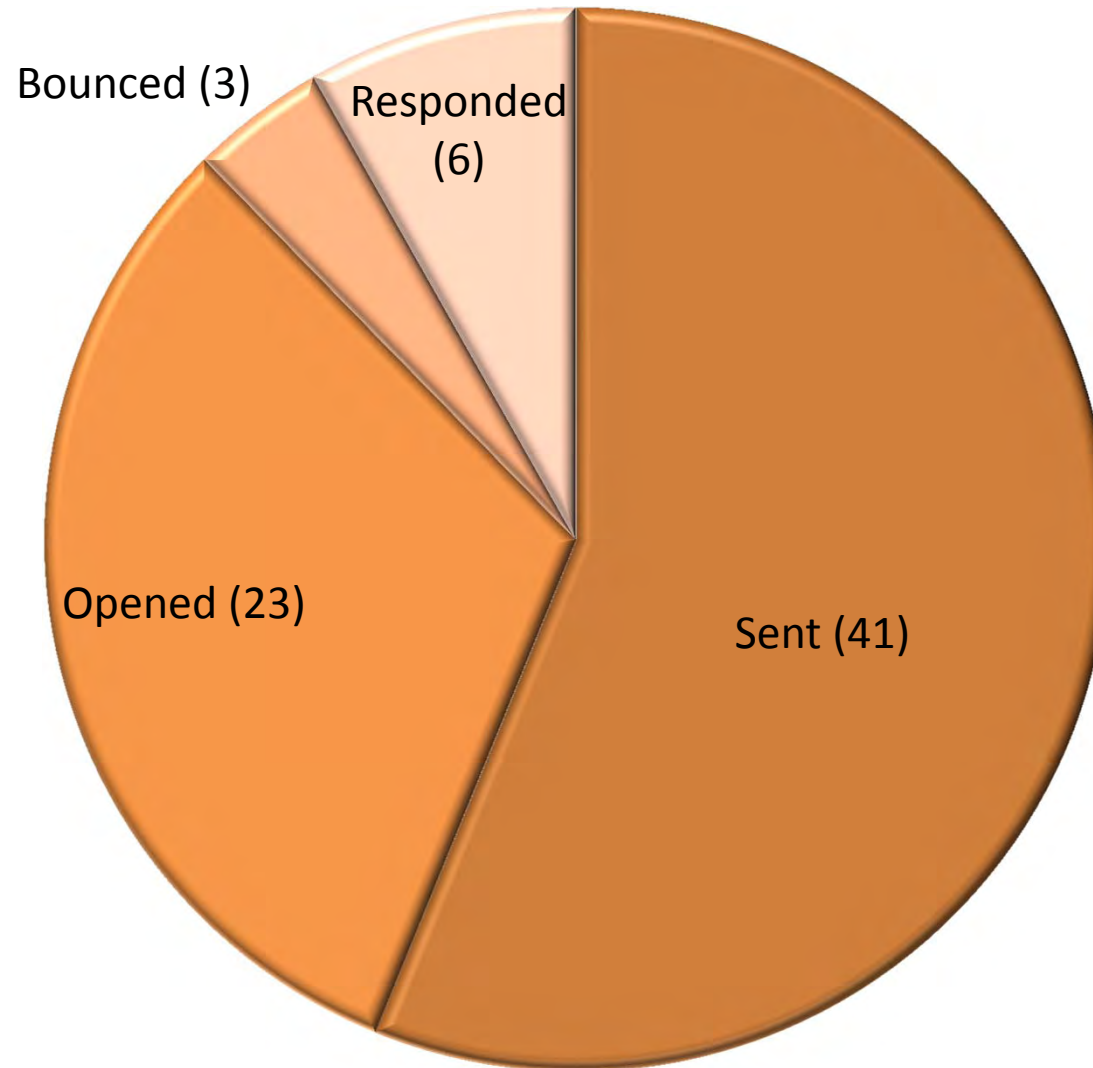
Date \_\_\_\_\_ (32) \_\_\_\_\_ Signed \_\_\_\_\_ (33) \_\_\_\_\_ Commission \_\_\_\_\_ (34) \_\_\_\_\_  
 (ANI's Signature) (National Board Number and Endorsement)

TABLE N-10-1  
GUIDE FOR COMPLETING FORM N-10

References to Circled Numbers in the Form	Description
(1)	The name and address of the Owner of the nuclear power plant.
(2)	The date this form was prepared.
(3)	Enter sheet number and total number of sheets comprising this Data Report package.
(4)	The name and address of the nuclear power plant where the work documented on this Data Report was performed.
(5)	The Owner's designated unit identification number.
(6)	A unique identification of the documentation authorizing the work (i.e., repair package no., work order no., NCR disposition work authorization no., etc.).
(7)	The name and address of the Certificate Holder performing the work (should be as indicated on the organization's Certificate of Authorization).
(8)	N-Symbol Stamp number (as indicated on the organization's Certificate of Authorization).
(9)	The expiration date of the Certificate of Authorization (as indicated on the organization's Certificate of Authorization).
(10)	The Code year and addenda applicable to the edition of Section III for the item receiving the work. Include Code Class of construction, as appropriate.
(11)	Record any Code Cases (including revision) used in the original construction of this item.
(12)	The Code year and addenda applicable to the repair of the item. Include Code Class of construction, as appropriate.
(13)	Record any Code Cases (including revision) used in the repair of this item.
(14)	The name of the item as described on the Data Report provided by the manufacturer who originally stamped the item.
(15)	Name of the manufacturer as described on the Data Report provided by the manufacturer who originally stamped the item.
(16)	The serial number of the item as described on the Data Report provided by the manufacturer who originally stamped the item.
(17)	National Board Number assigned to the item as described on the Data Report provided by the manufacturer who originally stamped the item.
(18)	Other appropriate identification (e.g., State or Province number, plant assigned designator) taken from drawings or other records.
(19)	Year the item was manufactured as described on the Data Report provided by the manufacturer who originally stamped the item.
(20)	A brief narrative of the work performed.
(21)	Indicate the appropriate pressure test performed following the repair. Include the test pressure.
(22)	Name, State of registration and registration number of the Registered Professional Engineer (RPE) who certified the original Design Specification.
(23)	Name, State of registration and registration number of the Registered Professional Engineer (RPE) who certified the original Design Report (or Stress Report or Stress Analysis as appropriate).
(24)	Name, State of registration and registration number of the Registered Professional Engineer (RPE) who certified the revised Design Specification, if applicable.
(25)	Name, State of registration and registration number of the Registered Professional Engineer (RPE) who certified the revised Design Report (or Stress Report or Stress Analysis as appropriate), if applicable.
(26)	Additional information necessary to describe the work performed. Describe any change from the original construction requirements.
(27)	Information pre-entered since only N Certificate Holders are allowed to perform this work.
(28)	Enter the N-Symbol Stamp number and expiration date of the organization performing the work.
(29)	Signature and title of the individual representing the organization performing the work and that is certifying the accuracy of the contents of the Data Report and its attachments. Include date of signature.
(30)	The name of the Inspector's employer, the Authorized Inspection Agency.
(31)	The address of the Authorized Inspection Agency (City/Town and State or Province).
(32)	The date (month, day, year) that the Authorized Nuclear Inspector signed the Data Report.
(33)	The Authorized Nuclear Inspector's signature.
(34)	The Inspector's National Board commission number and endorsement must be shown.

# NR Certificate Holders Survey

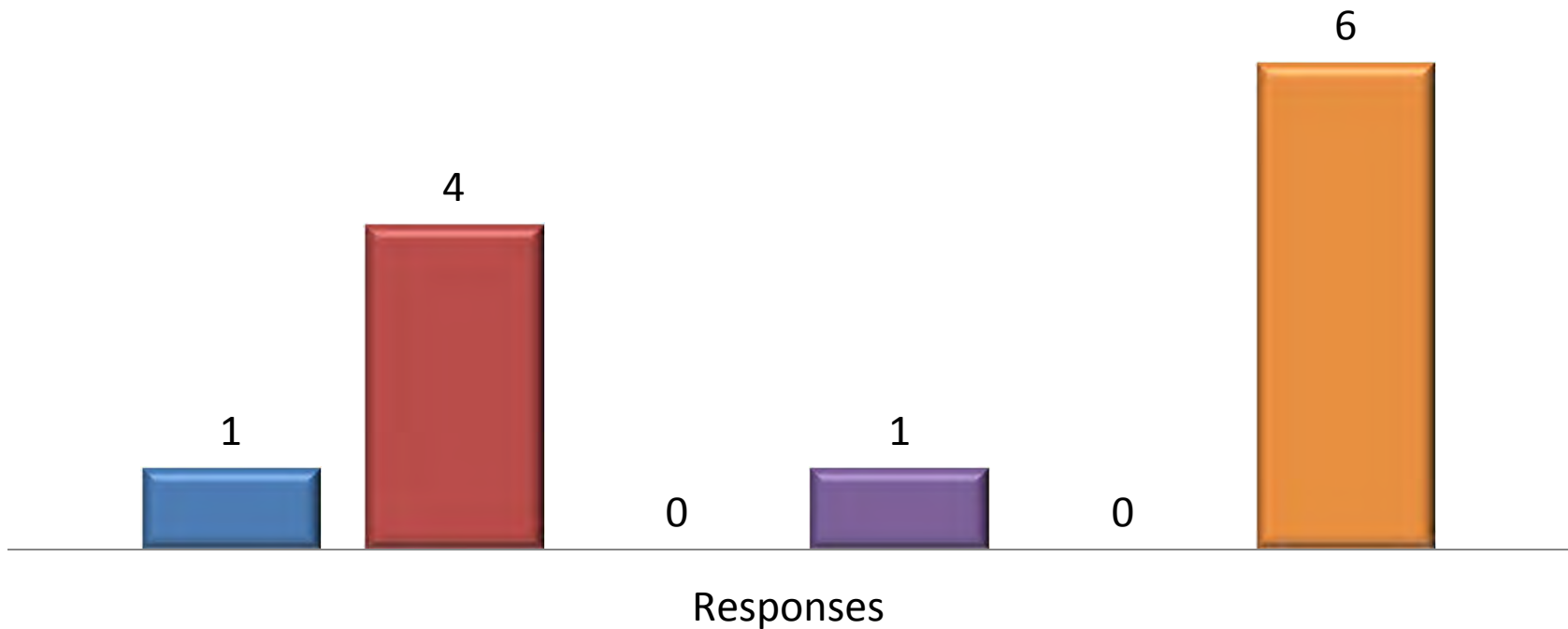
## NR Certificate Survey Results



How often does your organization use the NR Program for repair/replacement activities?

### Question 1

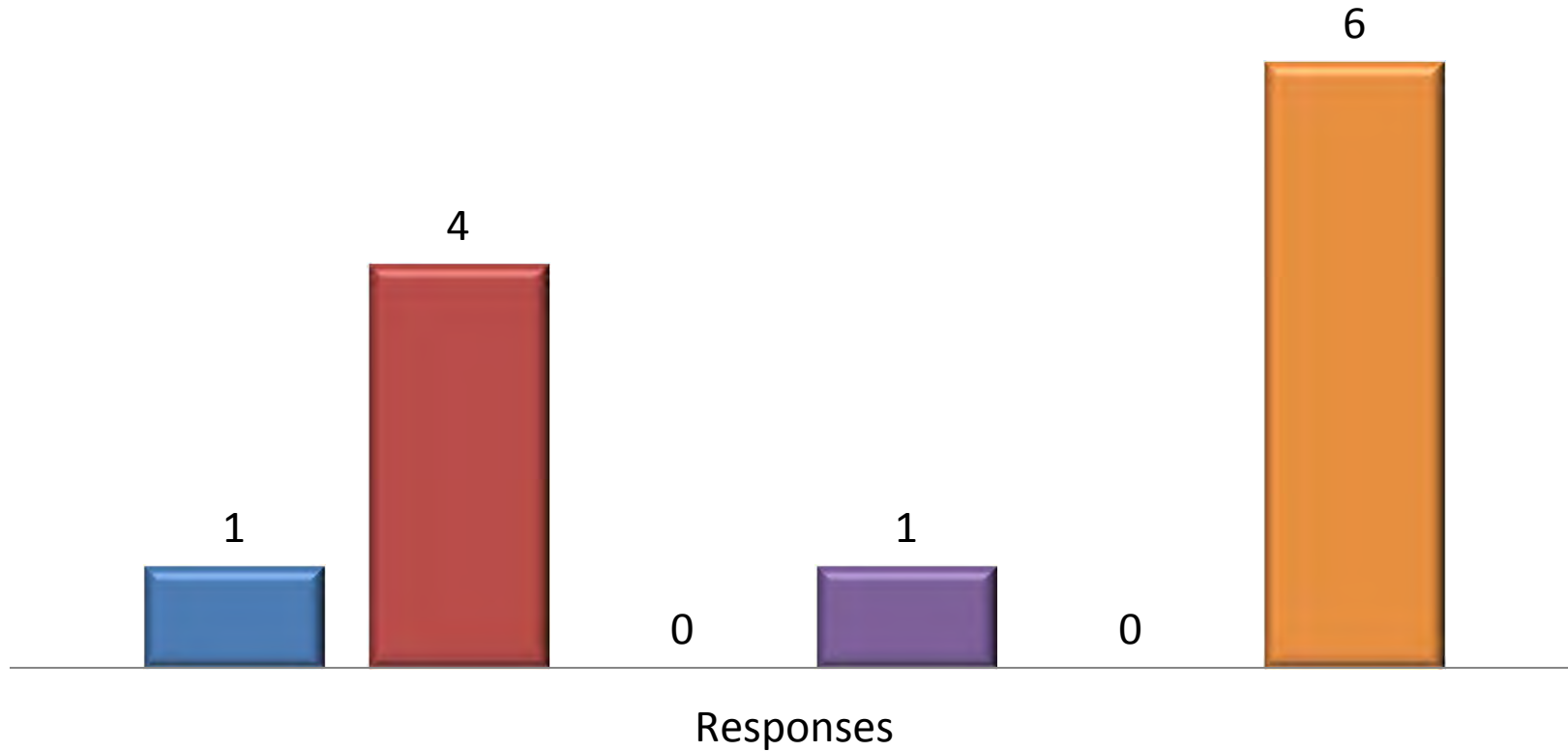
- Not used within the last 5 years
- 0-5 times a year
- 6-10 times a year
- More than 10 times a year
- No Response
- Toatal



How long has your organization had the NR Certificate of Authorization?

### Question 2

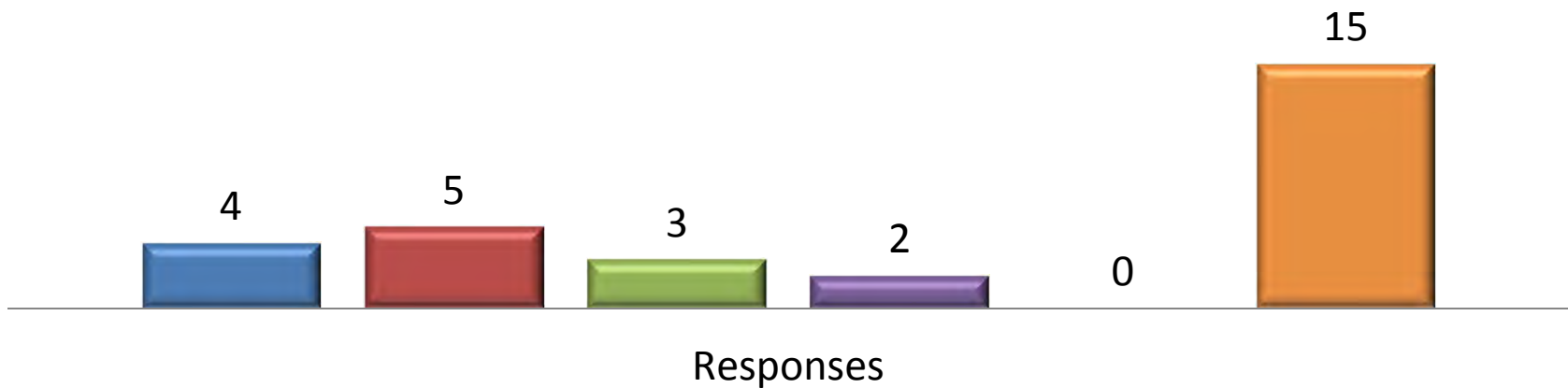
- 0-3 Years
- 4-6 Years
- 7-9 Years
- Greater than 9 Years
- No Response
- Total



When the NR Program is utilized, what are the circumstances? Please select all that apply.

### Question 3

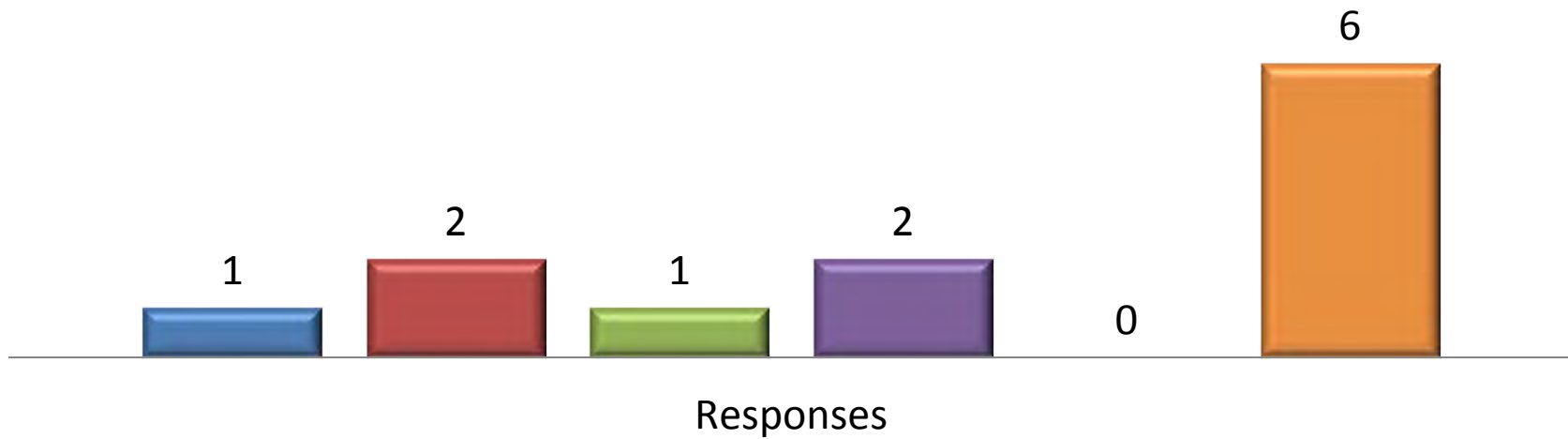
- When required by the jurisdictional authority
- When required by the owner/user
- When required by other organizations
- To repair items after signing the N-5 but before signing the N-3
- Other
- Total



# What parts of the NR Program are insufficient?

## Question 4

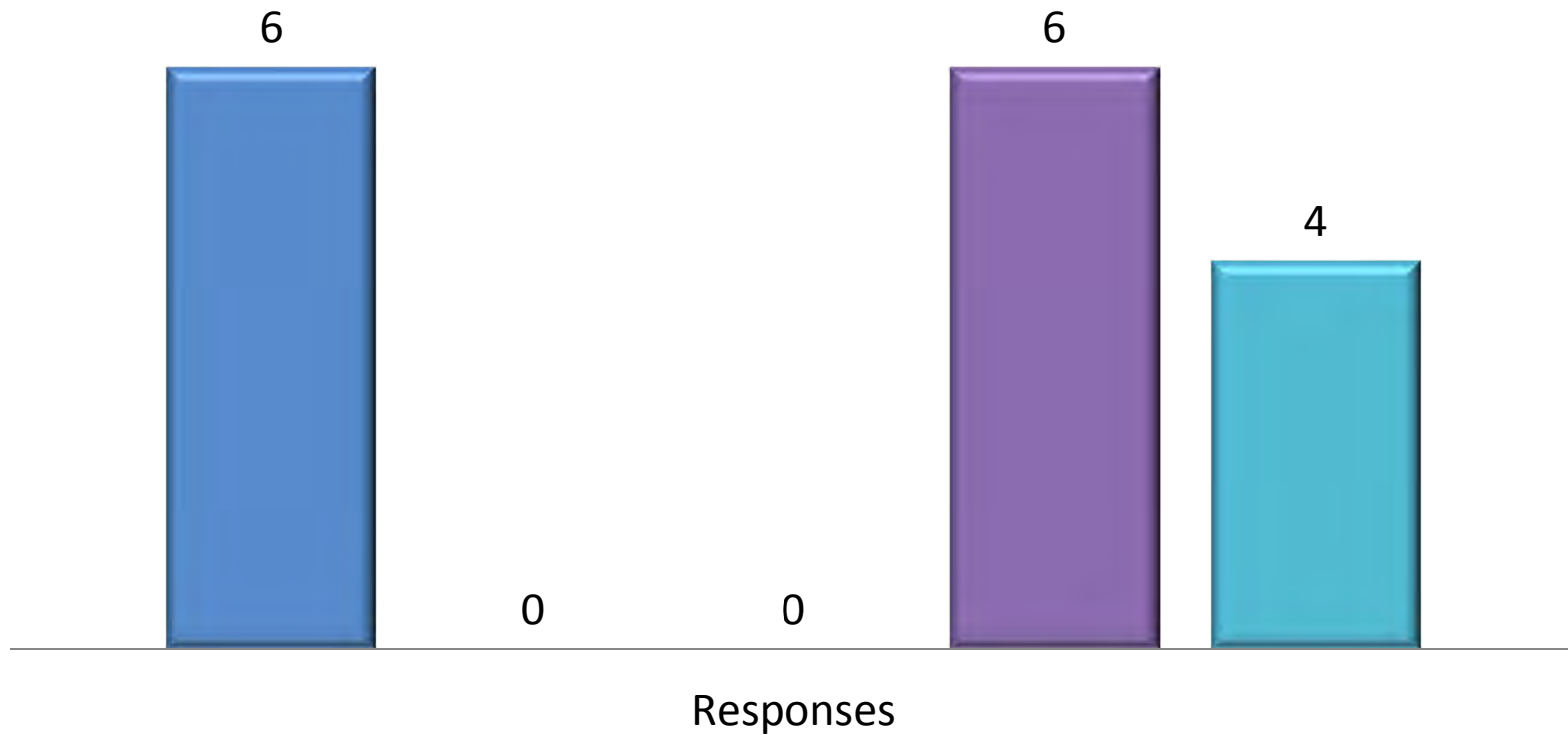
- All sections of the Quality Assurance Program
- Documentation, Stamping, and Certification
- Meeting customer requirements
- Meeting Enforcement and/or Regulatory Authority requirements
- Other
- Total



Is there value for your organization to have and maintain the NR Program of Authorization? Please explain using the comment box.

### Question 5

■ Yes ■ No ■ No Response ■ Total ■ Comments



## Comments to Question 5

Is there value for your organization to have and maintain the NR Program of Authorization?

1. As the majority of states do not require it for nuclear I would discontinue the NR stamp and leave the repairs/replacements under the jurisdiction of the regulatory agency and the licensed ASME XI rules alone.
2. Identifies us as providing quality products according to the code.
3. For marketing purpose we have maintained the NR Certificate of Authorization.
4. Currently required by the jurisdiction, and several benefits beyond what is permitted by Section XI based on the specific scope of authorization for our certificate of authorization.

## Comment for Improvement of the NR Program (Item #6)

Please provide recommendations for improvements to the NR Program, being as specific as possible.

1. We do not have difficulty with the program as established.
2. There is an interpretation, 04-16, that has caused many needless issues with the utilities. This interpretation requires the NRC licensed customer to be placed on the NR Certificate Holders Approved Suppliers List for providing items, materials & services for repairs/replacements conducted on their site. This should be revoked or clarified to the following: It is not required if the NR Certificate Holder performs an acceptance review of the documentation, the items are procured originally from an ASME Certificate Holder or fabricator is also on the Approved Suppliers List of the NR Certificate Holder. This has caused the NR Certificate Holder to audit the customer for items that already meet the construction code. It adds no value to the product and the customers are turning down proposals for contracts due to this. This will cause us to no bid with certain customers and possibly not renew the NR Certificate.
3. Less verbiage and put the requirements in more common terms.

Please provide recommendations for improvements to the NR Program, being as specific as possible.

4. I am with an AIA and do not have an NR stamp. But we do make NR inspections. It is a valuable program but needs to be in line with current ASME requirements, and more importantly, updated to current industry practices and needs.
5. There are several certification requirement inconsistencies for completing and NR-1 form, such as: 1: Necessitating recording of National Board numbers, while many items under the scope of ASME Section XI (e.g., pumps, valves, supports, etc.) that never required that a National Board number ever be assigned to the item originally.

Additionally, when the NR Certificate is used in conjunction with the VR Certificate it only applies to Section III "NV" stamped relief valves, yet many older nuclear plants have UV (Section VIII) stamped relief valves to which the combined NR/VR does not apply. This however creates a separate problem, since all repairs/replacement under XI require the services of an ANII, but by itself the VR Certificate does not require the use of an AIA for repair activities.

**NB-1201**

**1.8 "NR" ACCREDITATION REQUIREMENTS**

**1.8.1 SCOPE**

- a) This section provides requirements that must be met for an organization to obtain a National Board Certificate of Authorization to use the "NR" Symbol Stamp for Repair/Replacement activities to nuclear items constructed in accordance with the requirements of the ASME Code or other recognized codes or standards.
- b) For administrative requirements to obtain or renew a National Board "NR" Certificate of Authorization and the "NR" Symbol Stamp, refer to Procedure NB \_\_\_\_\_.

**1.8.2 GENERAL**

- a) An organization applying for an "NR" Certificate of Authorization shall have a written Quality Assurance Program that details the specific requirements to be met based on the intended category of activities selected by that organization as shown in Table 1.8.2-1. Additional requirements are established by Section 1.8.5 of this Part. Each applicant shall address these additional requirements in their Quality Assurance Program based on the category of activity to which certification is requested.
- b) Category 1  
Any ASME Code certified item or system requiring repair/replacement activities regardless of physical location and installation is prior to fuel loading.
- c) Category 2  
Any ASME Code certified item or system requiring repair/replacement activities installed in a nuclear facility after fuel loading.
- d) Category 3  
Items constructed to codes or standards other than ASME, requiring repair/replacement activities regardless of physical location and irrespective of fuel loading.

**TABLE 1.8.2-1**

Category of Activity	NR Quality Assurance Program Requirements	
<u>Category 1</u> ASME Code stamped items and systems requiring repair/replacement activities prior to fuel loading	Owner	Organizations other than Owner
	ASME Section III NCA-4000	ASME Section III NCA-4000
<u>Category 2</u> ASME Code Stamped Items and Systems requiring repair/replacement activities per ASME Section XI	Either <ul style="list-style-type: none"> <li>• ASME Sec XI, IWA-1400</li> <li>• 10 CFR 50, Appx. B</li> <li>• ASME NQA-1, Part 1</li> </ul> OR <ul style="list-style-type: none"> <li>• ASME Sec XI, IWA-4142.1(a)</li> </ul>	Either <ul style="list-style-type: none"> <li>• ASME NQA-1, Part 1</li> <li>• 10 CFR 50, App. B supplemented as needed with Owners QA program</li> </ul> OR <ul style="list-style-type: none"> <li>• ASME Sec III, NCA-4000</li> </ul>
<u>Category 3</u> Items constructed to standards other than ASME, requiring repair/replacement activities	ASME NQA-1, Latest Edition  OR  Specify the Standard to which certification is desired	ASME NQA-1, Latest Edition  OR  Specify the Standard to which certification is desired