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Glen Allen, Virginia 23060

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VIRGINIA POWER

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Rules and Directives Branch  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**DRAFT REGULATORY GUIDE DG-1082; ASSESSING AND  
MANAGING RISK BEFORE MAINTENANCE ACTIVITIES AT  
NUCLEAR POWER PLANTS**

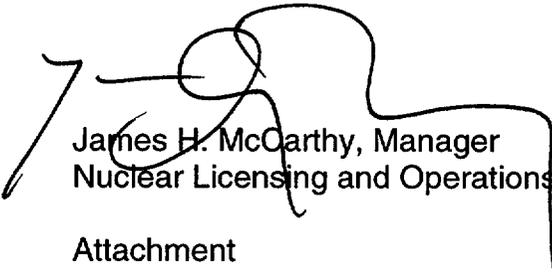
Virginia Power appreciates the opportunity to comment on the NRC's Draft Regulatory Guide DG-1082. Our comments are included in the attachment.

If you need further information, please contact either:

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Respectfully,

  
James H. McCarthy, Manager  
Nuclear Licensing and Operations Support  
Attachment

Add: W Scott

**VIRGINIA POWER COMMENTS**  
**DG-1082; ASSESSING AND MANAGING RISK**  
**BEFORE MAINTENANCE ACTIVITIES AT NUCLEAR PLANTS**  
**JANUARY 10, 2000**

<p>More time needed to implement new requirements</p>	<p>The Fed. Register Vol. 64, No 137/Monday July 19, 1999/ Rules and Regulations posted a revision to 10CFR50.65 (RIN 3150-A F95 Monitoring the Effectiveness of Maintenance at Nuclear Power Plants) that indicated that the new (a)(4) section would be implemented 120 days after issuance of Rev. 3 of Reg. Guide 1.160. This DG indicates that RG 1.160 is not going to be updated, but DG-1082 will be used with the existing RG 1.160 revision to implement the new (a)(4) section.</p> <p>While our program will continue to effectively monitor and manage risk from maintenance activities, we recommend allowing 240 days to properly implement these new requirements. While the intent of this rule change was to codify existing practices, this change involves considerably more work than simply changing a "should" to a "shall" in 10CFR50.65. The change involves a new paragraph of regulation and a considerable increase in Section 11 of NEI 93-01 (previously less than 4 pages now over 20 pages) along with the additional guidance provided in DG-1082. The additional time requested is needed for development of the proper documentation of our method of compliance with the new guidance documents.</p>
<p>Clarification of relationship of RG 1.160 and DG-1082 to "assess and manage the increase in risk"</p>	<p>The first full paragraph on page 2 of the DG-1082 discusses the use of both RG 1.160 and DG-1082 for "assessing and managing the increase...". It is not clear how RG 1.160 relates to assessing and managing risk. Please expand the paragraph to include a discussion of the specific section(s) of RG 1.160 that are important for this purpose.</p>
<p>Potential conflict between 11.3.2.6 and Appendix B.</p>	<p>Please add some text in Section 11 to clarify that Appendix B does not apply to configuration risk analyses.</p> <p>There appears to be a conflict between Section 11.3.2.6 and Appendix B. Configuration risk analyses are usually performed as described in Section 11.3.2.6. If the definition(s) of unavailability in Appendix B are applied to configuration risk analyses, the result would be a much higher risk increase for situations where components are defined to be unavailable but, in reality can be recovered. The difference is applying a human error probability of 0.1 versus a value of 1.0.</p>

<p>Clarification needed on page 5 in discussion of a(4) evaluation scope limits</p>	<p>Please add some text to indicate only configurations allowed by Technical Specifications need to be considered or eliminate the item. In its current form it will be a source of endless debate between NRC and industry.</p> <p>At the top of page 5 there is a discussion of limiting the scope of the a(4) evaluations. The phrase "regardless of plant configuration" makes it very difficult to eliminate any SSCs. For example, the fire pumps provide backup feedwater supply. Analyses of the importance of the fire pumps with one or two auxiliary feedwater pumps out of service do not show any increased importance for the fire pumps. However, if all three auxiliary feedwater pumps are out of service or the emergency condensate storage tank is out of service the fire pumps become risk significant. Of course, the technical specifications would force a rapid shutdown with all auxiliary feedwater pumps out of service or with the emergency condensate storage tank out of service. Thus, the text is impractical in its current form.</p>
<p>Additional documentation specified in 11.3.8.2. is unnecessary</p>	<p>Section 11.3.8.2 should end after the second sentence.</p> <p>The rest of the paragraph adds a requirement that additional documentation is required under two conditions. Currently, plant staff handles the consideration of the items in the two conditions during daily planning meetings. The requirement to document these meetings is unnecessary. The meetings represent expert panel sessions and the decisions are implemented via the station chain-of-command. The results are documented in the daily work plan but the reasons behind decisions are not documented.</p>
<p>DG-1082 encourages the use of less sophisticated methods</p>	<p>In general, the document seems to encourage the use of the less sophisticated methods. Those choosing to use PRA models require a higher level of effort: justify that the models are accurate, develop quantitative limits for both cumulative and configuration risk, and document their analyses under some conditions. Those using qualitative approaches have no such requirements.</p>