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**Domestic Utilities**

Ameren UE
American Electric Power
Carolina Power & Light
Commonwealth Edison
Consolidated Edison
Duke Power
Duquesne Light
Florida Power & Light

New York Power Authority
Northeast Utilities
Northern States Power
Pacific Gas & Electric
Public Service Electric & Gas
Rochester Gas & Electric
South Carolina Electric & Gas

Southern Nuclear
South Texas Projects Nuclear
Tennessee Valley Authority
TU Electric
Virginia Power
Wisconsin Electric Power
Wisconsin Public Service
Wolf Creek Nuclear

International Utilities

Electrabel
Kansas Electric Power
Korea Electric Power
Nuclear Electric LTD
Nuklearna Elektrana
Spanish Utilities
Taiwan Power
Vattenfall

OG-00-022

Project Number 694

March 27, 2000

DOCKET NUMBER**PETITION RULE PRM 50-68**
(65FR1829)

Secretary

US Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rule Makings and Adjudications Staff

Attention: Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration

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Westinghouse Owners Group Response to Request for Public Comments on Petition for Rulemaking Filed by Mr. Bob Christie Regarding Regulations Concerning Hydrogen Control Systems (Docket No PRM-50-68) (MUHP-4018)

Reference: Federal Register Notice, Volume 65, No. 8, Wednesday, January 12, 2000, Page 1829

The Westinghouse Owners Group (WOG) would like to thank you for this opportunity to comment on the proposed rulemaking regarding Regulations Concerning Hydrogen Control Systems in response to the Federal Register Notice of January 12, 2000 concerning the rulemaking petition to amend the NRC's regulations in 10 CFR 50.44, "Standards for Combustible Gas Control System in Light Water Cooled Power Reactors. These comments are based on the findings and insights from severe accident studies published by the NRC, by nuclear industry organizations, and by the licensees or nuclear power reactors.

The WOG believes that the recent licensing actions on the San Onofre hydrogen control system can be generically applied to all of the plants within the Westinghouse Owners Group membership. While the petition specifically requested a change for large dry PWR containments, we believe that the technical basis for the proposed change is equally applicable to ice condenser containment plants. Further, the WOG suggests that the requirement for all of the hydrogen control measures in 50.44 should be re-examined. This position is based on making the requirements for hydrogen control systems consistent with many other portions of plant operations and maintenance.

The Westinghouse Owners Group has sponsored a significant number of programs for our members over the past 10 years that have synergies with the hydrogen control measures required by 50.44. These include, but are not limited to:

- Emergency Response Guideline development and maintenance,
- Severe Accident Management Guidance development and maintenance,
- Core Damage Assessment Guidance development, and
- Development of a technical basis for changing the Post Accident Sampling System regulatory requirements.

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In addition several plant specific programs, such as the development of a systematic process for prioritizing and scheduling plant maintenance activities (under the Maintenance Rule) also have a synergy with the hydrogen control measure requirements. Achieving a level of consistency amongst all of the plant operational and maintenance activities related to hydrogen control systems should be one of the goals of an undertaking to re-examine 50.44 requirements.

Further, it is the WOG's position that it is in the best interests of the industry to incorporate any activities related to the resolution of this rulemaking petition with the NRC's recently announced schedule and activities at the February 24, 2000 "Risk Informed Regulation Workshop" to use Option 3 of SECY-98-300, "*Risk Informing NRC Technical Requirements*" for re-examining the regulatory requirements of 50.44. The WOG urges the NRC to move forward with this effort in an expedited manner, maintaining the high priority presently allocated.

If you have any questions regarding the WOG position described in this letter, please contact either Mr. Robert Lutz, Westinghouse, at (412) 374-4946, or email at lutzrj@westinghouse.com, or myself at 914-681-6262 or email at jacobs.k@nypa.gov.

Very truly yours



Karl Jacobs
Chairman
Westinghouse Owners Group