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**DRAFT REGULATORY GUIDE DG-1081; ALTERNATIVE
RADIOLOGICAL SOURCE TERMS FOR EVALUATING DESIGN BASIS
ACCIDENTS AT NUCLEAR POWER REACTORS**

Virginia Power appreciates the opportunity to comment on Draft Regulatory Guide DG-1081, which was issued by the NRC in December 1999.

Virginia Power endorses the comments submitted by the Nuclear Energy Institute (NEI) and looks forward to NRC staff evaluation of their merit.

Virginia Power has been involved with the alternative source term (AST) effort since March 1997, when the company provided data regarding Surry design basis radiological analyses for NRC staff's use in their re-baselining analysis study. The NEI has provided detailed comments on Draft Regulatory Guide DG-1081 and draft Standard Review Plan Section 15.0.1, each of which addresses analyses using ASTs.

The NEI comments provide clarification and suggested alternative guidance that, if considered by the NRC staff, would provide a more consistent framework within which licensees could maximize the benefits of implementing the AST. In many instances, the guidance offered in DG-1081 replicates the very conservative approaches recommended in existing regulatory guidance documents for design basis radiological analyses. NEI has identified cases in which available research could be credited in order to provide a more current technical justification for analysis guidance. Updating the guidance in this fashion is advisable, in that it would tend to reduce impediments to use of the AST. Such changes would reduce the uncertainty concerning the realization of adequate benefits to justify a licensee's effort in pursuing detailed AST analyses.

In particular, Virginia Power encourages the NRC staff to seriously consider the NEI comments associated with these topic areas:

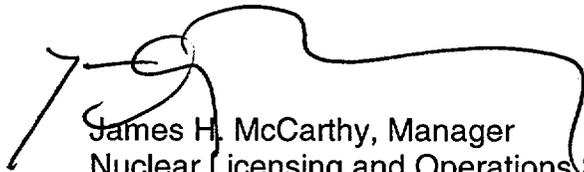
- Fission product content in fuel rod gap
 - use of values that account for different behavior among transients
 - values should consider the population of potentially failed rods for a given event
 - consider inherent core design features (e.g., rod power/burnup tradeoffs)
- Maintaining prior plant design basis that is not related to use of the AST
- Definition of 'mitigation phase' and 'recovery phase' of events as it relates to EQ doses

The following individuals are available to answer any questions or provide needed clarification concerning Virginia Power's comments:

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Respectfully,



James H. McCarthy, Manager
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