



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - PUBLIC COMMENT ON DRAFT REGULATORY GUIDE DG-1098, "SAFETY-RELATED CONCRETE STRUCTURES FOR NUCLEAR POWER PLANTS (OTHER THAN REACTOR VESSELS AND CONTAINMENTS)" (*Volume 65 Federal Register 177*)

TVA is pleased to provide comments for the proposed supplementary changes to DG-1098. The enclosure provides comments in response to the NRC's request published in the *Federal Register* on September 12, 2000.

If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,


Mark J. Burzynski
Manager
Nuclear Licensing

Enclosure
cc (Enclosure):
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(AFB)

ENCLOSURE

TVA'S COMMENTS

1. This regulatory guide is an evaluation of American Concrete Institute (ACI) 349. Currently, TVA uses the requirements of ACI 318 as the design basis for Browns Ferry, Sequoyah, and Watts Bar Nuclear Plant sites. Consequently, it is not expected that the methodologies and criteria contained in ACI 349 would be an imposed requirement for current TVA sites.
2. Regulatory position 6 imposes higher load factors than previous version of the code, for accident pressure terms without sufficient justification to require higher load factors.
3. Regulatory position 10.3.1 and 10.4.1 each specify an allowable ductility of less than or equal to 1.0. This is a departure from previous versions of ACI 349; furthermore, the aspect of specifying ductility values less than 1.0 implies that ductility methods for impactive and impulsive conditions are not allowed for the structure as a whole or for shear carried by concrete. There is no specified technical basis for this regulatory position. The allowable ductility for the structure and shear carrying capabilities should remain as currently specified in the code.