Dominion Generation
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Dominion

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

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REQUEST FOR COMMENTS ON THE DRAFT REGULATORY GUIDE DG-1103

To Whom It May Concern:

Virginia Electric and Power Company (Dominion) appreciates the opportunity to comment on the draft Regulatory Guide DG-1103, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Ventilation Exhaust Systems in Light-Water-Cooled Nuclear Power Plants", which was issued in October 2000.

We have reviewed the draft Regulatory Guide and submit the following comments for your consideration.

Comment 1, Section C.6.3, first paragraph:

Section C.6.3. of the draft Regulatory Guide will implement new requirements. Specifically, the proposed definition of "communicating" will now result in testing that was not previously required, as shown in the following discussion.

In-place aerosol leak test for HEPA filters will now be required following painting, fire, or a chemical release in any ventilation zone communicating with the normal atmosphere cleanup system. Practically speaking, there will be no discretion in this requirement for two reasons. First, many system isolation dampers are not leak tight by design, even when new. Second, footnote 5 allows "'painting', 'fire', and 'chemical release'" to be defined in terms of the potential for degrading the HEPA filters and adsorbers. However, to use this allowance and still achieve verbatim compliance with the testing requirements, we would have to define the specific conditions under which "'painting', 'fire', and 'chemical release'" would not be considered "'painting', 'fire', and 'chemical release'". This is not straightforward and could easily lead to inconsistent application by a licensee.

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Add = ANN Beranek (AFB)

The need to ensure that normal atmosphere cleanup systems remain capable of meeting design specifications would be better accomplished by requiring that an evaluation of the need for testing be conducted whenever painting, fire, or a chemical release occurs in any ventilation zone communicating with the normal atmosphere cleanup system. The evaluation process should be formally developed and consistently applied and should be based on a well-documented, sound, and conservative technical basis.

Comment 2, Section C.6.3, first paragraph:

The first paragraph of section 6.3 of the draft Regulatory Guide specifies the normal ventilation system should have a combined penetration and leakage of less than 0.05% during the in-place test to be credited with a 99% efficient system. Additional penetration values are not provided nor is there any reference to another specification that will allow more penetration. Although revision 1 to Regulatory Guide 1.140 did not specify any other penetration than 0.05%, GL 83-13 provided clarification for the Regulatory Guide and specified an acceptable range of penetration based on the assumed efficiency for the system.

The draft Regulatory Guide should be revised to include additional penetrations or specify that the requirements of GL 83-13 are still valid.

Comment 4, Section C.6.4, first paragraph:

The first paragraph of section 6.4 of the draft Regulatory Guide provides the requirements for in-place testing of charcoal adsorber filters. It also specifies the penetration cannot exceed 0.05%. The draft Regulatory Guide should be revised to reference other acceptable penetrations as discussed in Comment 3 above.

If you would like further information, please contact either:

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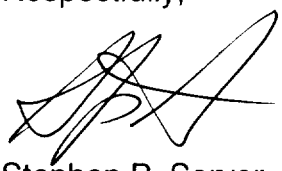
Respectfully,



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