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

December 21, 2000

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(7)

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)-1102 & DG-1103
(*Federal Register, Volume 65, No. 211, Page 65024*)

TVA is pleased to provide comments on DG-1102, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants," and 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." The enclosure provides comments in response to the NRC's request published in the *Federal Register* on October 31, 2000.

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

Sincerely,

Mark J. Burzynski

Mark J. Burzynski
Manager
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Enclosure
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ENCLOSURE

COMMENTS

COMMENTS ON DG-1102

1. Under "B. Discussion," second paragraph, third sentence - Also include the term "secondary containment." This term is widely used throughout the industry and also encompasses several of the other areas in this sentence.

2. Under C.1. The paragraph states that systems are acceptable if built to ASME N509-89 and tested to ASME N510-89 are acceptable. It also states that systems tested to earlier versions of N510 are also acceptable. It is unclear if the paragraph does mean that systems designed and built to earlier versions of N509 are acceptable. Please provide clarification if all versions of N509 are acceptable for the systems.

3. Under C.3.6. - Additional reference to either AG-1 or ASME N509 would make the item more complete rather than using only reference to ERDA 76-21. The ERDA document, although correct, is approximately 25 years old. It would be beneficial to have more current references.

4. Under C4.10, third paragraph, second sentence - The term should be fire "suppression" system. This is an editorial comment as the section should read that a suppression system needs to be installed.

5. Under C.6.4. - Allowances should be made for increased bypass leakage for systems that assume less than 95 percent efficiency charcoal. For plants that have assumed 90 percent or less efficiency in their calculations, the 0.05 percent bypass leakage is too restrictive. The 0.05 percent bypass leakage should only apply to 95 percent or higher efficiencies assumed in calculations. For lower efficiencies a lessening of the bypass leakage would not affect the analysis as the filter would still be capable of meeting the efficiencies used in calculations. We recommend that a bypass leakage of 1 percent be allowed for systems that assume less than 95 percent efficiency for charcoal.

6. Under C.7.2. - Define foreign material or clarify what is meant by foreign material. The term is ambiguous. For example, if a screwdriver was accidentally left in a housing and during the next inspection it was found, then it would be considered foreign material; thus result in an unnecessary test. It appears that the term "foreign material" applies to liquid or gaseous material that entered the housing uncontrolled between inspections and that may have affected either the particulate filters or charcoal filters.

COMMENTS ON DG-1103

1. Under C.1. - The paragraph states that systems are acceptable if built to ASME N509-89 and tested to ASME N510-89 are acceptable. It also states that systems tested to earlier versions of N510 are acceptable. It is unclear if the paragraph does mean that systems designed and built to earlier versions of N509 are acceptable. Please provide clarification if all versions of N509 are acceptable for the systems.

2. Under C.3.3. - Additional reference to either AG-1 or ASME N509 would make the item more complete rather than using only reference to ERDA 76-21. The ERDA document, although correct, is approximately 25 years old. It would be beneficial to have more current references.

3. Under C.6.4. - Allowances should be made for increased bypass leakage for systems that assume less than 95 percent efficiency charcoal. For plants that have assumed 90 percent or less efficiency in their calculations, the 0.05 percent bypass leakage is too restrictive. The 0.05 percent bypass leakage should only apply to 95 percent or higher efficiencies assumed in calculations. For lower efficiencies, a lessening of the bypass leakage would not affect the analysis as the filter would still be capable of meeting the efficiencies used in calculations. We recommend that a bypass leakage of 1 percent be allowed for systems that assume less than 95 percent efficiency for charcoal.