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Washington, D.C. 20555-0001

REQUEST FOR COMMENTS ON THE DRAFT REGULATORY GUIDE DG-1102

To Whom It May Concern:

Virginia Electric and Power Company (Dominion) appreciates the opportunity to comment on the draft Regulatory Guide 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, 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.3.1:

If the licensee performs a new analysis of humidity, the draft Regulatory Guide requires "an NRC-approved analysis that demonstrates that the air entering the charcoal is maintained at less than or equal to 70% relative humidity under all design-basis accident conditions". Normally the NRC allows changes to be made to this type of analysis using the 10 CFR 50.59 process to determine if NRC prior review is required. Currently if the analysis methodology is described in the UFSAR and a methodology change is made, then an NRC review is required unless the methodology has been approved at another facility and the licensee adopts that methodology as described by GL 83-11.

Requiring an NRC approved analysis by the draft Regulatory Guide appears to contradict other NRC regulations concerning NRC analysis approval, specifically the recently revised requirements in 10 CFR 50.59. Also, if a Licensee decides to adopt the revised Regulatory Guide and its humidity analysis has not specifically

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been approved by the NRC, is submittal to and approval by the NRC required prior to adoption of the Regulatory Guide?

Prior to issuing this revised Regulatory Guide, the NRC should resolve the conflict concerning analysis approval discussed above and how to adopt the Regulatory Guide.

Comment 2, 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 ESF 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 7 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.

The need to ensure that ESF 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 ESF 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 3, Section C.6.3, first paragraph:

The first paragraph of section 6.3 of the draft Regulatory Guide specifies the ESF 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 2 to Regulatory Guide 1.52 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.

Comment 5, Section C.7.2:

Section 7.2 of the draft Regulatory Guide specifies when the laboratory test for the adsorber charcoal is to be performed. Revision 2 of Regulatory Guide 1.52 specifies testing every 720 hours of system operation **or** at least every 18 months for a system in standby status.

The draft Regulatory Guide specifies testing after 720 hours of operation **and** every 24 months or once per refueling for a system in standby status. These seem to be separate requirements. It appears that one could end up conducting testing after 720 hours of operation and then have to conduct testing a short time afterward to meet the 24-month/refueling requirement for a system in a standby status. The draft Regulatory Guide should be revised to avoid potentially duplicate testing. This could be accomplished by changing "...system, and (4)... to read "...system, or (4)..." in the fourth line of the sentence.

If you would like further information, please contact either:

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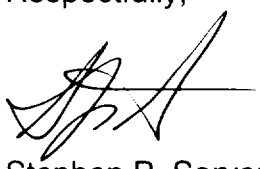
Respectfully,



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