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2001 SEP 17 PM 3:40

Rules and Directives
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66 FR 38332

7/23/01

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September 6, 2001

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

GL01-018

COMMENTS ON DRAFT REGULATORY GUIDE DG-1110

Virginia Electric and Power Company (Dominion) appreciates the opportunity to provide the following comments on Draft Regulatory Guide DG-1110, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

1. The proposed regulatory guide revision contains PRA scope criteria and peer review expectations in Section 2.2.3 and Appendix A which are currently unachievable by most licensees and which will eliminate the usefulness of most licensees external event, low power, shutdown, and complete Level 2 PRAs in risk-informed regulatory applications until the industry augments the peer review process to incorporate this additional scope. Most licensees have only an at-power Level 1 and limited Level 2 PRA for internal and external initiating events. The current industry peer review process scope is to at-power Level 1 and limited Level 2 (i.e., LERF) PRAs for internal initiating events. These changes would eliminate credit for external event, low power, shutdown, and complete Level 2 PRAs in risk-informed applications until subjected to a peer review in accordance with the prescriptive requirements in Appendix A. While the proposed change allows licensees to utilize an integrated decisionmaking panel to qualitatively supplement unmet or unreviewed PRA scope criteria, this will effectively require all licensees to convene an integrated decisionmaking panel for every application to ensure the criteria in Appendix A are addressed. As a recommendation, the proposed change to the regulatory guide should establish graded PRA quality criteria commensurate with the application, as in the industry peer review process and draft ASME PRA standard.

E-RIDS = ADM-03

Template = ADM-013

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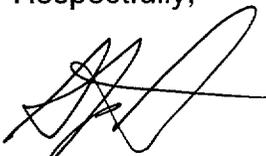
2. There is an inconsistency in the proposed regulatory guide revision between the PRA capability necessary to address the risk-acceptance guidelines in Section 2.2.4 and that described in Appendix A. The risk acceptance guidelines in Section 2.2.4 are based on the capability to calculate changes in core damage and large early release frequency, while Section 2.2.3 requires that all the PRA characteristics and attributes defined in Appendix A be assessed for impact on an application, including Level 2 large late release frequency. The need to calculate full Level 2 results should be eliminated from Appendix A.
3. The peer review process described in Appendix A of the proposed regulatory guide revision indicates that the PRA models are compared against the plant design and assumptions to validate that they reflect the as-built and as-operated plant. In the current industry peer review process, the peer review process does not confirm that the entire model corresponds to the as-built plant. The as-built review is one that examines the model applicability as information is presented to the peer review group. The peer review does not provide an independent review of the as-built features of the plant to ensure that they are included except as it may result from the PRA peer review process. This may occur if information becomes available as a result of the review that indicates the model is different than the as-built plant and there is limited or no basis to support the differences; in such a case, substantially lower grades can be assigned. The Maintenance and Update of the PRA is the element that ensures that a process is in place to capture changes in plant configuration, practices, or procedures. Appendix A should be revised to be consistent with the industry peer review process.

If you would like further information, please contact either:

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Respectfully,



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