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September 17, 2001

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

Subject: Comments on NRC Draft Regulatory Guide DG-1110, An Approach for Using Probabilistic Risk Assessment in Risk Informed Decisions on Plant Specific Changes to the Licensing Basis

Reference: Federal Register Vol. 66, No. 138, Page 37497, dated : July 18, 2001

CNRO-2001-00044

Gentlemen:

Entergy Operations, Inc. (Entergy) is pleased to submit our comments in the above captioned matter, as follows:

- 1) Typo in section 1.5 – “T he” should be “The”
- 2) Although all PSAs are expected to have a PSA Certification performed by the end of 2002, in the interim, there is no guidance for the Utility as to what is expected in lieu of the PSA Certification. See 3<sup>rd</sup> bullet in section 2 defining the principles for the staff’s proposed evaluation approach and acceptance. Since the NRC has not endorsed the PSA Certification at this time, it appears to be a contradiction to include the PSA Certification as a requisite for risk based applications.
- 3) Table 1 of section 2.2.3.1 lists Fire as an internal event initiator. While this may be intuitive, including fires as an internal event does not follow the precedence set forth in the IPEEE effort.
- 4) Table 1 of section 2.2.3.1 discusses Level 2 PSA in the context of LERF and long term containment integrity. Since the text following the table defines the metrics for risk characterization as CDF and LERF, the inclusion of long term containment integrity will only confuse the Level 2 issue in relation to risk informed applications and should be removed. Only the LERF metric should be retained for Level 2 PSA, as it would capture all of accident scenarios important to public health risk.

Template = ADM-013

E-RIDS = ADM-03  
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Comments on Draft Regulatory Guide DG-1110

September 17, 2001

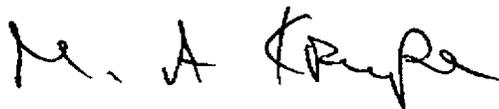
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- 5) The text in section 2.2.3.1 explicitly states that a qualitative treatment is sufficient in many cases. However, Table 2 requires external hazards analysis as a requirement of a complete PRA. The requirement for external hazards analysis should be removed from table 2 and prescribed as an enhancement to the PRA model.
- 6) The inclusion of fire analysis as an internal event (Table 2) is not a fair treatment of this initiator. The uncertainties associated with fire events are large (i.e., hot shorts, spatial interactions, heat release rates, etc.), therefore, fire events should be removed from table 2 and prescribed as an enhancement to the PRA model.
- 7) The text in section 2.2.3.1 discusses long term containment integrity in relation to Level 2 and LERF. As discussed in comment #4, this guide should consider only LERF as the appropriate risk metric. Any discussion of the long-term containment integrity should be removed from this document.
- 8) While the addition of the new Appendix A only provides a general listing of attributes and characteristics, this appendix is redundant to the PSA standard requirements as outlined in the ASME PSA standard. Appendix A should be removed.
- 9) Section 2.2.4 restricts the core power level to 3800 Mwt and a fuel burn-up to approximately 40,000 MWD/MT. There is no basis for these values provided. In addition, at least one existing plant is licensed to core power levels greater than 3800 MWT. Most of these plants in the vicinity of these power and burnup levels have plans for extended power up-rates. It is not appropriate to issue this guidance with these limitations without providing the bases for them. Further, it is recommended some interium guidance be provided for the treatment of those plants exceeding these parameters.

Thank you for the opportunity to provide these comments. If you have any questions concerning this submittal, please contact Richard Harris (601-368-5443) or Jerry Burford (601-368-5755).

Sincerely,



MAK/REH/DR/bal

cc: (See Next Page)

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