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Rules and Directives  
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USNRC

September 17, 2001

Mr. Michael T. Lesar, Acting Chief  
Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: T-6 D59  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Mr. Lesar:

NUCLEAR REGULATORY COMMISSION - INDUSTRY COMMENTS ON DRAFT  
REGULATORY GUIDE DG-1110 (VOLUME 66 *FEDERAL REGISTER* 38332)

TVA has reviewed DG-1110 as a proposed revision to Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," published in the July 23, 2001 *Federal Register*. TVA offers the following comments regarding the proposed revision:

- No clear explanation of the need, basis, or rationale is provided for the proposed changes.
- The proposed revisions are extensive and go beyond clarification, significantly raising the Staff's expectations with respect to PRA capabilities to support licensee change requests. For example, the need to address late containment failure is a significant addition to the current Regulatory Guide.
- Appendix A establishes attributes of an "acceptable PRA," shifting the philosophy of the current Regulatory Guide from "commensurate with the application."

TVA believes that a clear rationale should be provided and offered for public comment before any significant changes are made to Regulatory Guide 1.174.

TVA also supports the comments made by the Nuclear Energy Institute.


Memplate = ADM-013

E-RIDS = ADM-03  
Add = J. Lane (SCH1)  
M.T. Dravin (MXD)  
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Mr. Michael T. Lesar  
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We appreciate the opportunity to comment on the draft Regulatory Guide. If you have questions regarding this response, please contact me at (423) 751-2508.

Sincerely,

  
Mark J. Burzynski  
Manager  
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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