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PROPOSED RULE PR 50
(66 FR 57001)

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USNRC

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

January 15, 2002 (12:12PM)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

December 17, 2001

Secretary
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Mail Stop O-16C1
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION - REQUEST FOR PUBLIC COMMENT -
"STANDARDS FOR COMBUSTIBLE GAS CONTROL SYSTEM IN LIGHT-WATER COOLED
POWER REACTORS" - Volume 66, Number 220, Federal Register 57001-
57002

TVA appreciates the opportunity to comment on the subject
Federal Register notice regarding draft rule wording for 10 CFR
50.44. TVA believes that the draft rule represents an
improvement and supports the draft rule change with comments as
follows:

TVA is not aware of a need to retain the section of the
rule on post-accident inerting for currently licensed
plants. We support elimination of this section of the
rule.

TVA notes that the proposed rule requires oxygen monitoring
for plants with inerted containments. The current rule
only requires hydrogen monitors. We do not object to the
rule wording requiring oxygen monitors. However, we
believe that the associated regulatory guide should permit
Boiling Water Reactor (BWR) Mark I and Mark II plants to
retain their current Post Accident Monitoring (PAM)
requirements for the hydrogen and oxygen monitors provided
one type of monitor is PAM Category 2 or higher. There
does not appear to be a benefit in requiring plants to
potentially upgrade oxygen monitors if the hydrogen
monitors already are Category 2 or better. Having either
the hydrogen monitors or the oxygen monitors classified as
PAM Category 2 or higher provides sufficient assurance that
monitoring of combustible gases can be accomplished.

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

Sincerely,

A handwritten signature in cursive script that reads "Mark J. Burzynski".

Mark J. Burzynski
Manager
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001