

One Middle Street
Portsmouth, NH 03801
March 15, 2002

12/14/01
66 FR 64893

(7)

Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Administration
Washington, D.C., 20555

Subject: Additional Comment on Draft Regulatory Guide DG-1111, "Atmospheric Relative Concentrations for Control Room Radiological Habitability Assessments at Nuclear Power Plants"

Polestar Applied Technology, Inc. has been party to the development of comments on DG-1111 as part of its involvement with the NEI Control Room Habitability Task Force. However, one additional comment is offered for consideration:

It does not appear that the definition of "x" provided by Equation 11 is consistent with Equation 10 and Figures 3 and 4. According to Equation 11, x would decrease with time, becoming zero when $ut = D$. Furthermore, is NRC proposing that 1.0 m/s be the appropriate wind speed to use with Equations 10 and 11 for all applications, or is this provided for Equation 11 as a typical or sample value?

Very Truly Yours,



James Metcalf
Project Manager

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add = A. Beranek (AFB)
S. Lavoie (SFL)