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Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION - REQUEST FOR PUBLIC COMMENT - DRAFT GUIDE (DG) 1113 (*VOL. 67 FEDERAL REGISTER 3743*)

TVA appreciates the opportunity to comment on the subject draft regulatory guide. The enclosure provides our detailed comments. In addition, we support comments made by the Nuclear Energy Institute.

If you have questions regarding our comments, please contact R. M. Brown at (423) 751-7228.

Sincerely,

Mark J. Burzynski
Manager
Nuclear Licensing

cc (Enclosure):
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ENCLOSURE

PAGE	PARAGRAPH	COMMENT	PROPOSED REVISION
4	1.3.1 - first paragraph	Plants have specific licensing bases. This paragraph should emphasize that the individual plant licensing basis is what governs the plant dose analysis. As this DG covers more than just operator dose, the existing licensed basis for the plant is what governs the analysis. As such, this is a change in the licensing basis for plants and is not warranted or acceptable without the cost benefit study that appropriately considers all of the costs including reanalysis of the LOCA and potential hardware costs. This is clearly an example of regulatory growth.	Rewrite the paragraph to indicate that only the accidents covered in the plant licensing basis need to be analyzed.
E1 and F1	Appendix E, 1.1.2 and Appendix F, 1.1.2	The iodine spiking factor of 335 is considered high. A more appropriate value (example 35) should be used. Additionally, the spiking factor should be the same for both the steam tube generator rupture and the main steam line break, as the core responds the same in both events.	Revise paragraph 1.1.2 in Appendix F to indicate that a spiking factor of 335 should be used.
18	5.1.2	The paragraph implies that loss of offsite power (LOOP) can occur at any time during an accident. That dose analysis (according to the DG) should be based on the most limiting instance when LOOP is assumed to occur. However, LOOP is currently typically assumed concurrent with the initiation of an event. To require that LOOP occur at any possible time following an event is contrary to how existing analysis were performed and contrary to existing licensing basis.	Change the paragraph to state LOOP concurrent with initiation of the event.