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OPPD
Omaha Public Power District

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

References:
1. Docket No. 50-285
2. Letter from Nuclear Energy Institute (A. Marion) to Rules and Directives Branch - Nuclear Regulatory Commission, dated June 28, 2002, Comments on Draft Regulatory Guides DG-1114, Control Room Habitability at Nuclear Power Reactors, and DG-1115, Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors
3. NEI 99-03, Control Room Habitability, June 2001

SUBJECT: **Comments on Nuclear Energy Institute Comments on Draft Regulatory Guides DG-1114, Control Room Habitability at Nuclear Power Reactors, and DG-1115, Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors**

In Reference 2, the Nuclear Energy Institute (NEI) submitted its comments on the draft Regulatory Guides DG-1114 and DG-1115. The Omaha Public Power District (OPPD) concurs with NEI's comments.

OPPD agrees with NEI's assessment in Reference 2 that multiple license amendments would potentially be required to implement DG-1114 at Fort Calhoun Station (FCS). This appears contrary to the NRC staff's stated purpose for preparing the DGs to reduce the resources necessary to address control room habitability issues. OPPD also agrees with NEI that DG-1114 and DG-1115 are not explicit about their applicability to plants not licensed to the General Design Criteria (GDCs), such as FCS.

As stated by NEI in Reference 2, the traditional ΔP surveillance test may have only required a single test point, while component test methodology required an extensive set of measurements to demonstrate pressure inside the control room is at positive pressure to all adjacent areas. OPPD agrees with NEI that disallowing use of component test methodology for establishing a base control room inleakage value is not justified. Additionally, OPPD agrees with NEI that validation of tracer gas methodology builds a strong basis for licensee use of component testing methodology.

Template = ADM-013

E-RIDS = ADM-03
Add = A. Berrick (AFB)
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NEI states in Reference 2 that ASTM-E741 does not provide guidance on partitioning the total inleakage into its filtered and unfiltered components. FCS agrees with NEI that DG-1114 should be revised to state that it is the responsibility of licensees to determine the appropriate balance between filtered and unfiltered inleakage and how test uncertainty will be used in analyses.

NEI states in Reference 2 that DG-1115 proposes a retest interval of 24 months and that implementation of DG-1115 will result in a research program to gather data to justify an alternative test interval in the future. FCS agrees with NEI that the NRC should adopt the guidance in Reference 3 with respect to retest intervals. Tracer gas results achieved at FCS with unfiltered inleakage of less than 50 scfm would warrant a 10 year testing interval as described in Reference 3.

NEI states in Reference 2 that sample Technical Specifications for implementing the requirements of DG-1114 are provided in Section C.2.7.1 of DG-1114. FCS agrees with NEI that the protocols for revision of the Standard Technical Specifications (i.e., the Technical Specifications Task Force (TSTF) process) should be utilized in the development of generic changes to Technical Specifications.

If you have additional questions, or require further information, please contact Dr. R. L. Jaworski at (402) 533-6833.

Sincerely,

R. T. Ridenoure
Division Manager
Nuclear Operations

RTR/TRB/trb