



RECEIVED

2002 SEP -4 PM 2:45

Rules and Directives
Branch
121500

8/02/02
67FR50475
①

August 27, 2002

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

GL02-050

**COMMENTS ON MODEL SAFETY EVALUATION ON TECHNICAL
SPECIFICATION IMPROVEMENT TO MODIFY REQUIREMENTS
REGARDING MODE CHANGE LIMITATIONS USING THE CONSOLIDATED
LINE ITEM IMPROVEMENT PROCESS**

Dear Sirs:

Virginia Electric and Power Company (Dominion) appreciates the opportunity to provide the following comments on the subject proposal for a model safety evaluation presented in the Federal Register, volume 67, number 149, page 50475 on August 2, 2002.

The last sentence of the first paragraph of Section 3.0, "Technical Evaluation" states, "Good practice should dictate that such transitions should normally be initiated only when all required equipment is operable and that mode transition with inoperable equipment should be the exception rather than the rule." If the required risk evaluation determines that it is acceptable to enter a Mode with certain equipment inoperable, then this restriction is unnecessary. There may be some situations that recur routinely where the plant would benefit by changing Modes with certain equipment inoperable. If the risk evaluation has determined that this change in Modes is acceptable, then it should not matter if it is done routinely or as an "exception rather than the rule."

We note the following typographical errors for your consideration.

Section 2.0, first paragraph, second to last sentence: change "provide" to "provides",

Section 3.0, second paragraph, third sentence: change "plants" to "plant's",

Template = ADM-013

*E-RIDS = ADM-03
Add = R. Dennig (RLD)*

Section 3.0, second paragraph, fourth sentence: change "allowances" to "allowance."

Section 3.1.1, fifth paragraph, third sentence: change "the systems/components not to be granted the LCO 3.0.4 or SR 3.0.4 allowances for the various modes listed." to "the systems/components not to be granted the LCO 3.0.4 or SR 3.0.4 allowances for the various modes are listed."

Section 3.1.2, first paragraph, second sentence: change delta "DCDF" to delta "CDF."

If you have any questions regarding our comments, please contact

Ms. Regina Borsh regina_borsh@dom.com or (804) 273-2247

Mr. Don Olson don_olson@dom.com or (804) 273-2830

Respectfully,



for Stephen P. Sarver, Director
Nuclear Licensing & Operations Support