

Date: September 5, 2002

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64FR 31385
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Subject: Comments on Proposed Generic Letter on Control Room Envelope Habitability

Is the year of issue of ASTM Standard E 741 deliberately omitted? If this is not a deliberate omission, the most recent cite is ASTM E741-00.

Under "required information", it states that licensees must confirm that they have a defensible value for unfiltered inleakage. For most plants this means that integrated tracer gas testing will be required. As there are only two vendors with any direct experience in this type of testing [both with limited staff availability], it appears that 180 day time frame is unrealistic.

Continuing on this point, if it is the NRC's intent to entice other contractors into the business of integrated testing, it is unlikely that sufficient experience could be gained by any new contractor in the requisite 180 days. Thus questions could be raised by NRC at a later date as to the veracity of the numbers being generated.

Accordingly some allowance must be made for rational scheduling and orderly performance of integrated inleakage testing. From the perspective of the existing test contractors, 360 or even 480 days may be a more realistic number considering that at least 2/3 of the plants have yet to undertake any type of integrated testing.

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From: "Peter Lagus" <plagus@worldnet.att.net>
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Date: 9/6/02 2:26PM
Subject: comments

gentlemne:

attached are my comments on the draft RG 1115 and the draft generic letter on the habitability of the control room envelope.

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