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Division of Administrative Services
U. S. Nuclear Regulatory Commission
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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PROPOSED NRC GENERIC LETTER 2002-XX:
CONTROL ROOM ENVELOPE HABITABILITY (TAC No. MB2788)**

Gentlemen:

Attached are comments from the Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants on the subject proposed generic letter issued in May 2002. The STARS plants appreciate the opportunity to comment on the proposed generic letter. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodlan1@txu.com.

Sincerely,

D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
STARS

Attachment: STARS Comments on Proposed NRC Generic Letter 2002-XX: Control Room Envelope Habitability

¹ STARS consists of six plants operated by TXU Generation Company LP, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

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add = J. Blumberg (UMBA)

ATTACHMENT

STARS COMMENTS ON PROPOSED NRC GENERIC LETTER 2002-XX:
 Control Room Envelope Habitability

COMMENT NUMBER	FED. REG. PAGE & COLUMN	SECTION & PARA. #	COMMENT	PROPOSED REVISION
1	31386, 1 st column	<i>Background, 1st paragraph</i>	<p>The paragraph states that the CRE “encompasses the control room and other rooms and areas that personnel must access to accomplish plant control functions in the event of an accident.” This statement can be interpreted to mean all areas of the plant where accident recovery missions take place. For example, the statement above implies if an operator must manually manipulate a valve in the safeguards building to accomplish a control function then he is in the CRE.</p> <p>Licensees may unnecessarily attempt to expand the control room to encompass areas that were not intended to be habitable as delineated in GDC 19.</p>	Reword the sentence to say the “The Control Room encompasses the licensee defined area or areas for which GDC 19 is applicable.”
2	31386, 2 nd column	<i>Background, 3rd paragraph</i>	The paragraph states that plants with a positive-pressure CRE have generally implemented testing programs. Most plants with a positive-pressure CRE have a technical specification surveillance to verify that the control room is at a positive pressure with respect to potentially contaminated adjacent areas. The reference to “testing programs” may indicate to the reviewer that plants should be doing something more than a surveillance.	Change the sentence in question and the sentence following to read “ <u>Most</u> plants with a positive-pressure CRE <u>have a technical specification surveillance to verify that</u> those ventilation systems serving the CRE can maintain the CRE at a positive differential pressure relative to adjacent spaces.”

3	31386, 3 rd column	<i>Background,</i> 4 th paragraph	<p>The paragraph states that the E741 test is well suited for assessing the integrity of positive-pressure or neutral-pressure CREs.</p> <p>Test results indicate that this test method is not well suited for assessing the integrity of low-leakage, positive-pressure CREs because of the relatively large uncertainties in the test results. The E741 test does not differentiate whether the source of inleakage is filtered or unfiltered.</p>	Delete the sentence stating that the E741 test is well suited for assessing the integrity of positive-pressure or neutral-pressure CREs.
4	31386, 3 rd column	<i>Background,</i> 6 th paragraph	The discussion of the ΔP surveillance is not characterized correctly. Although it is not a comprehensive test for measuring inleakage across the entire boundary, the surveillance can identify CREHS deficiencies. The surveillance will verify that no in-leakage exists for the boundary sections measured. Therefore, it can be inferred that the measured inleakage at these locations is zero.	Delete the first three sentences of the paragraph and replace them with the following: "The ΔP surveillance will verify that there is no inleakage across the sections of the CRE boundary where measured. For those sections where the surveillance can not verify that a positive differential pressure exists relative to adjacent spaces, some other leakage test method is necessary." Delete the words "Second" and "test" from the fourth sentence, and change the sentence to read " <u>The ΔP surveillance</u> cannot determine..."
5	31386, 3 rd column	<i>Background,</i> 7 th paragraph	The paragraph overstates the capabilities of E741 testing. E741 testing does not identify sources of inleakage. The E741 testing only identifies that inleakage exists. The ΔP and individual component testing are necessary to identify the CREHS deficiencies.	Delete the first two words of the paragraph "The E741..." and start the paragraph with "Testing..."

6	31388, 1 st column	<i>Requested Information, Paragraph 1.(b)</i>	<ol style="list-style-type: none">1. Paragraph indicates that the limiting inleakage in the hazardous chemical assessment is the same as the inleakage for the radiological analyses referred to in paragraph 1.(a). The limiting hazardous chemical assessment inleakage is usually a different value and does not include a filtered source.2. Fire assessments typically do not include a limiting inleakage value. However, licensees should be able to qualitatively assess whether the source of a fire in combination with any migration of smoke across the control room boundary will adversely impact the capability to control the reactor from either the CRE or the alternate shutdown panel.	<ol style="list-style-type: none">1. Change the first sentence of the paragraph to read: "That the most limiting inleakage into your CRE is incorporated into your hazardous chemical assessment."2. Add a new sentence to read: "That a fire in combination with any migration of smoke across the control room boundary due to leakage will not adversely impact the capability to control the reactor from either the CRE or the alternate shutdown panel."
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