



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

RECEIVED

2002 SEP 23 PM 2: 53

Rules and Directives
Branch
USNRC

September 19, 2002

10 CFR 50.44

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

8/16/02
67 FR 53628
(2)

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - COMMENTS ON DRAFT
REGULATORY GUIDE (DG) -1117 - VOL. 67 FEDERAL REGISTER 53628, DATED
AUGUST 16, 2002

TVA appreciates the opportunity to comment on the proposed Draft Regulatory Guide
(DG) -1117, *Control of Combustible Gas Concentration in Containment*. NRC
developed DG-1117 to provide suitable guidance for meeting the requirements of a
proposed amendment to 10 CFR 50.44.

TVA's comments are provided in the enclosure.

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

Sincerely,

Mark J. Burzynski
Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Template = ADM-013

E-RIDS-ADM-03
Add = H. Beranek (HFB)
D.C. COLLISON (DC)

ENCLOSURE

COMMENTS ON PROPOSED DG 1117

COMMENT NUMBER	DG 1117 SECTION	COMMENTS
1	C.2.2	The third sentence states that "Safety-related oxygen monitoring systems installed and approved by the NRC prior to the effective date of the rule are sufficient to meet this criterion." While this is acceptable, it would be better if the guide used the words provided with the proposed change to 10 CFR 50.44 that states "Existing oxygen monitoring commitments for currently licensed plants meet the intent of the rule."
2	C.2.2	Add to this section that oxygen monitors are required only for plants that inert containment.
3	C.5	This section, titled "Containment Structural Integrity," should state that this does not apply to currently licensed plants, but new plants. This change is consistent with the wording in the rule.