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Crystal River Unit 3 supports the proposed rule on Combustible Gas Control Following are two comments on documents associated with the proposed rule

1. Comment on Draft Regulatory Guide DG-1117: The draft guide is silent as to the fate of Regulatory Guide 1.7. It is assumed that this draft guide will become Regulatory Guide 1.7, Revision 3 and will supercede Revision 2. If this is not the case, then words need to be added to the guide to specify that this new guide supercedes Regulatory Guide 1.7, Revision 2, as the two guides would conflict with each other.

2. Comment on Proposed Safety Evaluation: It is recommended that the Safety Evaluation also include conclusions as to the acceptability of eliminating containment purging as the design basis method for post-LOCA hydrogen control. Some licensees use containment purging as the design basis method for compliance with the current 10CFR50 44, rather than hydrogen recombiners Although the containment purge requirements were not incorporated into the Technical Specifications, as was done for hydrogen recombiners, the requirement for purging exists in docketed commitments to the NRC and in the FSAR. The process of changing the FSAR and the docketed commitments would be simplified if the NRC Safety Evaluation included consideration of containment purging.

Ray Crandall Crystal River Unit 3

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USNRC October 15, 2002 (11:49AM)

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OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

Template = SECY-067