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Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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COMMENTS ON DRAFT REGULATORY GUIDE DG-3021

Dear Sirs:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut appreciate the opportunity to comment on the subject draft regulatory guide. Our comments are provided as follows.

The draft regulatory guide, DG-3021, is not consistent with the proposed rule changes of 10CFR Part 72.

DG-3021 provides the following information regarding the use of existing DE at a nuclear power plant.

APPROACH, Lines 79 to 88, "The general process to determine the DE at a new ISFSI or MRS site includes:

1. Site- and region-specific geological, seismological, geophysical, and geotechnical investigations, and
2. A PSHA"

"For ISFSI sites that are co-located with existing nuclear power generating stations, ... the applicant should evaluate whether new data require re-evaluation of previously accepted seismic sources and potential adverse impact on the existing seismic design bases of the nuclear plant."

C.1.1, Lines 151 to 163, "...For ISFSIs co-located with existing nuclear power plants, the existing technical information should be used along with all other available information to plan and determine the scope of additional investigations....."

Template = ADM-013

F-RIDS = ADM-03
Call =
T.H. Clark (TLC)
M. Shah (MJS3)

10CFR Part 72 states in part:

I. Background, last paragraph, "...the Commission believes that the seismically induced risk from the operation of an ISFSI or MRS is less than at an operating NPP. Therefore, the Commission proposes to revise the DE requirements for ISFSI and MRS facilities from the current part 72 requirements, which are equivalent to the SSE for a NPP."

IV. Discussion, "The Commission does not intend to require new ISFSI or MRS applicants that are co-located with a NPP to address uncertainties because the criteria used to evaluate existing NPPs are considered to be adequate for ISFSIs, in that the criteria have been determined to be safe for NPP licensing, and the seismically induced risk of an ISFSI or MRS is significantly lower than that of a NPP, as described in Section IV."

VI. Discussion of Proposed Amendments by Section, Section 72.103, "Applicants located in either the western U.S. or in areas of known seismic activity in eastern U.S., and co-located with a NPP, have the option of using the proposed PSHA methodology or suitable sensitivity analyses for determining the DE, or using the existing design criteria for the NPP."

72.103(a)(2), "For a site with a co-located nuclear power plant (NPP), the existing geological and seismological design criteria for the NPP may be used..."

72.103(b), "If an ISFSI or MRS is located on a NPP site, the existing geological and seismological design criteria for the NPP may be used..."

RECOMMENDED CHANGE:

Clarify that applicants that are co-located with a NPP have the option of using the existing DE of the NPP without any further evaluations.

If you have any questions regarding our comments, please contact:

Mr. Bob Pavlik

bob_pavlik@dom.com or (804) 273-3044

Mr. Don Olson

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

Respectfully,



S. P. Sarver, Director
Nuclear Licensing & Operations Support