NUCLEAR ENERGY INSTITUTE

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Mr. Mark F. Reinhart
Office of Nuclear Reactor Regulation
Probabilistic Safety Assessment Branch
U. S. Nuclear Regulatory Commission
Mail Stop O10-H4
Washington, DC 20555-0001

SUBJECT: Control Room Habitability Guidance

PROJECT NUMBER: 689

Enclosed is Revision 1 to NEI 99-03, *Control Room Habitability Guidance.* It is provided for NRC staff review and endorsement. Our intent is to issue Revision 1 of NEI 99-03 for licensee use in January 2003.

The revisions to this guidance were the subject of NRC regional meetings conducted during the summer of 2002, an August 19, 2002, letter to you and a September 10, 2002, public meeting. Other significant changes to the guidance include:

- **PROGRAM**
  - A control room habitability program is defined that includes periodic retest and assessment guidance.

- **TECHNICAL SPECIFICATION**
  - The guidance was revised to address concerns with the accuracy of the Control Room Emergency Filtration System (CREFS) Technical Specification (TS) at some plants. Should a licensee need to modify its plant's CREFS TS, guidance is provided to use the revised CREFS TS being developed by the NEI Technical Specification Task Force (TSTF). We understand that the TSTF will provide the revised CREFS TS traveler to its NRC counterpart in early December 2002.

- **SMOKE**
  - Qualitative guidance is provided to achieve safe shutdown from the control room or the alternate control panel in the event of an internal or external smoke event.

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- **ANALYSES**
  - The guidance evaluates the adequacy of the plants existing licensing basis and associated assumptions. The guidance acknowledges that the design assumptions listed in the NRC Regulatory Guide 1.183 or DG-1113 (when issued) may be useful to licensees.
  - Licensees may use the DG-1111 (when issued) guidance on atmospheric dispersion in conjunction with their current licensing basis, DG-1113 (when issued) or Regulatory Guide 1.183.

- **TEST METHODOLOGIES**
  - ASTM E741, *Standard Test Methodology for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution*, provides a methodology generally acceptable for determining control room inleakage. The guidance lists exceptions to ASTM E-741 methodology that reflect the practices used by vendors performing control room inleakage tests.
  - The document includes guidance for using the component test methodology as an alternate to the ASTM E741. This is consistent with discussions conducted at the NRC regional meetings held this summer.

Several appendices provided in the guidance are now for information only and are not part of the formal guidance.

We are prepared to meet with you the week of December 9 to discuss NRC staff comments on the draft guidance. As stated in our August letter, we believe that Revision 1 to NEI 99-03 eliminates the need for the NRC staff to issue DG-1114 and DG-1115. We will discuss this item during the proposed December meeting.

If you have questions, please contact Kurt Cozens at (202) 739-8085, koc@nei.org, or me at (202) 739-8080, am@nei.org.

Sincerely,

Alexander Marion

KOC/maa
Enclosure

c: Mr. Michael R. Johnson, U. S. Nuclear Regulation Commission
Ms. Suzanne C. Black, U. S. Nuclear Regulation Commission
Mr. Joseph L. Birmingham, U. S. Nuclear Regulation Commission