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

GL03-007

**COMMENTS ON DRAFT REGULATORY GUIDE DG-1120 AND DRAFT  
STANDARD REVIEW PLAN CHAPTER 15.0.2**

Dear Sirs:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut appreciate the opportunity to comment on the draft regulatory guide, DG-1120, "Transient and Accident Analysis Methods" and the draft Standard Review Plan Chapter 15.0.2, "Review of Transient and Accident Analysis Methods" as requested in the Federal Register, volume 68, number 19, page 4524 on January 29, 2003. Our comments are as follows:

Dominion endorses the comments provided to you by the Nuclear Energy Institute (NEI) in their March 24, 2003 letter and by the Westinghouse Owner's Group (WOG) in their letter of March 24, 2003. Both these letters express our reservations that, in its current form, this Regulatory Guide will not meet its intended objective of reducing regulatory uncertainty and facilitating staff review of analysis methods. Furthermore, we agree with the assertion of these letters that issuance of the Guide in its current form will have a chilling effect on analysis methods development, particularly among utilities, which is contrary to the objectives of Generic Letter 83-11, Supplement 1.

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

Mr. Noval Smith      noval\_smith@dom.com or (804) 273-2267 or,

Mr. Don Olson      don\_olson@dom.com or (804) 273-2830

Respectfully,

C. L. Funderburk, Director  
Nuclear Licensing & Operations Support

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