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Subject: Draft Regulatory Guide DG-1129 (Proposed Revision 3 of Regulatory Guide 1.75), Criteria for Independence of Electrical Safety Systems

Gentlemen:

The subject Draft Regulatory Guide has been issued for public comment. This Draft Regulatory Guide has been reviewed by IEEE's Nuclear Power Engineering Committee (NPEC) including its Subcommittee 6 and Working Group 6.5 with the following comments:

Regulatory Position 1:

Sections 7.1.2.1, 7.1.2.4 and 7.2.2.3 of IEEE Std 384-1992[1] should be supplemented as follows: The breaker or fuse automatically opened by fault current may be used as an isolation device provided (a) the breaker, or fuse time-overcurrent trip characteristics, for all circuit faults under bolted and arcing fault conditions (assuming multiple faults of all non-safety-related loads) will cause the circuit breaker to interrupt the fault current prior to initiation of a trip of any upstream circuit breaker, and (b) periodic testing during every refueling must demonstrate that the overall coordination scheme under multiple faults of all non-safety-related loads remains within the limits specified in the design criteria for the nuclear power plant.

1. IEEE Std 384-1992, "Standard Criteria for Independence of Class 1E Equipment and Circuits"

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E-RIDS = ADM-03

Template = ADM-013

cc = S.K. Aggarwal (SKA)

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NPEC Comment:

In portion (a) of Regulatory Position 1, the use of the word "all" in the phrase "assuming multiple faults of all non-safety-related loads" infers a requirement to consider simultaneous fault of all non-safety-related loads connected to the isolation device, or of all non-safety related loads connected to all of the isolation devices on a given power source. A specific event may create a credible scenario that results in simultaneous fault of those loads exposed to the event. However, it is not credible to assume that all non-safety-related loads, including those not exposed to the event, will fault simultaneously. Per IEEE-603[2], Section 5.1 on single failure criterion, a probabilistic assessment can be used to eliminate consideration of events and failures that are not credible. NPEC believes the regulatory position should be revised to recognize that multiple faults of non-safety-related loads should be addressed using risk-informed methodologies. Multiple faults need be considered only if a probabilistic assessment demonstrates that a particular event can cause simultaneous faults.

In portion (b) of Regulatory Position 1, the requirement to test circuit breakers during every refueling outage is not consistent with other surveillance frequencies for circuit breaker testing. NPEC believes the Regulatory Position should be revised to require a less restrictive testing frequency such as periodically testing a sample of the population or other test interval as provided by Section 6.5 of IEEE Std. 338-1987[3], as endorsed by NRC Regulatory Guide 1.118[4], Revision 3. Also, the Regulatory Position appears to include both circuit breakers and fuses in the periodic testing requirement. NPEC believes that fuses should be excluded from periodic testing because overcurrent trip testing of fuses is destructive in nature.

2. IEEE Std 603-1991, "Criteria for Safety Systems for Nuclear Power Generating Stations"
3. IEEE Std 338-1987, "Standard Criteria for the Periodic Testing of Nuclear Power Generating Station Safety Systems"
4. Regulatory Guide 1.118, Revision 3, "Periodic Testing of Electric Power and Protection Systems

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Also, note that the phrase "multiple faults of all non-safety-related loads" is repeated in Regulatory Position 1 (b). NPEC reiterates its position stated in the comments on Regulatory Position 1 (a) that it is not credible to assume that all non-safety-related loads, including those not exposed to a particular event, will fault simultaneously. Thus, NPEC believes that periodic testing must demonstrate that the overall coordination scheme remains within the limits specified in the design criteria for the nuclear power plant.

NPEC Recommendation:

NPEC recommends restating Regulatory Position 1 as follows:

Sections 7.1.2.1, 7.1.2.4, and 7.2.2.3 of IEEE Standard 384-1992 should be supplemented as follows: The breaker or fuse automatically opened by fault current may be used as an isolation device provided (a) the breaker, or fuse time-overcurrent trip characteristics, for all credible circuit faults as determined by probabilistic assessment of the initiating events will cause the circuit breaker or fuse to interrupt the fault current prior to initiation of a trip of any upstream circuit breaker, and (b) periodic testing consistent with the test interval guidance provided by Section 6.5 of IEEE Std. 338-1987, as endorsed by NRC Regulatory Guide 1.118, Revision 3, demonstrates that the overall coordination scheme remains within the limits specific in the design criteria for the nuclear power plant.

Regulatory Position 4:

Section 5.6(3) of IEEE Std 384-1992 should not be construed as allowing less than minimum separation of non-safety-related circuits from safety-related circuits to be justified by analyses without treatment of the affected non-safety-related circuits as associated circuits.

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NPEC Comment:

The Regulatory Position does not address the actual construction of Section 5.5 for Associated Circuits and 5.6 for Non-Class 1E Circuits.

The intent of Section 5.5.2 is to provide specific criteria options for associated circuits as follows:

(1) that they shall be uniquely identified, and be separated the same as and be subject to the same requirements as Class 1E circuits,

(2) that they shall be in accordance with (1) up to and including an isolation device and thereafter be considered non Class 1E, or

(3) that they shall be analyzed or tested to demonstrate that Class 1E circuits are not degraded below an acceptable level.

Note that Item (3) does not specify any identification requirement for the associated circuit. This means that once the analysis is complete to demonstrate that Class 1E circuits are not degraded below an acceptable level, then the associated circuit can then be reclassified as a non-Class 1E or non-safety-related circuit.

The intent of Section 5.6 is to provide methods for achieving independence of non-Class 1E circuits from Class 1E circuits or associated circuits by one of the following requirements:

(1) proper physical separation of non-Class 1E to Class-1E and associated circuits,

(2) electrical isolation of non-Class 1E to Class-1E and associated circuits,

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(3) analysis to demonstrate that non-Class 1E circuits cannot adversely affect Class 1E and associated circuits, or

(4) specific separation and isolation requirements for non-Class 1E instrumentation and control circuits to associated circuits.

Section 5.5.1(4) states that "proximity to associated circuits and equipment without the required physical separation or barriers" makes a non-Class 1E circuit an associated circuit. If a non-Class 1E circuit that is analyzed to demonstrate that it cannot degrade a Class 1E or associated circuit must still be considered an associated circuit, then this means that all of the other non-Class 1E circuits it is in proximity to also become associated circuits. This can result in the associated circuit classification cascading throughout the plant from one non-Class 1E circuit to the next non-Class 1E circuit even though it was demonstrated that the initial non-Class 1E circuit would not degrade a Class 1E circuit below an acceptable level. This is not the intent of the requirements in Sections 5.5 and 5.6.

If a non-Class 1E circuit can be analyzed to demonstrate it cannot degrade a Class 1E or associated circuit, then it satisfies 5.6(3) and can be considered a non-Class 1E circuit, not an associated circuit. This is consistent with Section 5.5.2(3) to allow use without requiring unique identification as an associated circuit per Section 5.5.2(1) or requiring the use of an isolation device per Section 5.5.2(2). NPEC recognizes that there is an inconsistency between Sections 5.5.2(3) and 5.6(3) on how to classify non-Class 1E circuits that have been analyzed and shown to not degrade Class 1E circuits. A revision of the standard to resolve the consistency in accordance with this comment will be pursued.

NPEC Recommendation:

NPEC recommends restating Regulatory Position 4 as follows:

Section 5.5.2(3) of IEEE Standard 384-1992 allows associated circuits to be used without uniquely identifying them as such or

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isolating them from Class 1E circuits provided testing and analysis demonstrates that the Class 1E circuits are not degraded below an acceptable level. Per the requirements of Section 5.6(3), such circuits can be classified as non-Class 1E circuits.

Regulatory Positions 2, 3, and 5: No comment.

Thank you for the opportunity to participate in the comment process of Regulatory Guide 1.75 and we trust that these comments will be useful the completion of the revision of the document. If you have any questions, please contact Randy C. Jamison, Chairman of Working Group SC 6.5, at (603) 773-7810, or the undersigned..

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