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Rules and Directives
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**COMMENTS ON NOTICE OF PROPOSED DRAFT GENERIC LETTER 2003-XX:
POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY RECIRCULATION
DURING DESIGN BASIS ACCIDENTS AT PRESSURIZED WATER REACTORS
(FEDERAL REGISTER, VOLUME 69, NUMBER 62, PAGE 16980,
DATED MARCH 31, 2004)**

Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to provide comments on the proposed "Draft Generic Letter 2003-XX: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," as described in the subject Federal Register Notice. The draft generic letter addresses concerns regarding the potential impact of debris blockage on emergency recirculation during design basis accidents at pressurized water reactors (PWRs) and requests information regarding these concerns. The concerns were identified during research associated with Nuclear Regulatory Commission (NRC) Generic Safety Issue (GSI) - 191, "Assessment of Debris Accumulation on PWR Sump Performance."

Dominion recognizes the importance of ensuring the design requirements of the Emergency Core Cooling System (ECCS) and Containment Spray System (CSS) are met. We acknowledge the need to evaluate the current design of containment recirculation sumps in light of the recent research regarding the effects of debris generated by a Loss of Coolant Accident (LOCA).

Dominion fully supports the Nuclear Energy Institute comments submitted on June 1, 2004 and strongly urges the Commission to carefully consider their recommendations. The following comments are made to reemphasize certain NEI points.

1. The proposed schedule for providing information to the NRC is of major concern. The NRC has acknowledged the efforts of the industry to develop guidance to address GSI-191 concerns. This guidance will provide PWR licensees with methods to evaluate accident conditions which could affect containment sump performance and to develop and implement corrective measures should they be found necessary. Given the current NRC schedule to issue the generic letter in August and the safety evaluation of the industry guidance subsequently in September, licensees will have little time to fully understand the methodology before responding to their plant-specific situation. Additionally, the time period between issuance of the generic letter and the due date (April 1, 2005) for the detailed response is considered to be inadequate given the amount of analysis required and the limited availability of

E-RFDS = ADM-03

Att. = C. Petrone (ADP)

Thompson = ADM-013

qualified contractors to assist licensees with their evaluations. The NRC has committed to completing resolution of the GSI-191 issue by December, 2007. A more reasonable approach would be to tie the schedule requirements of the generic letter to the issuance of the safety evaluation for the industry guidance and the completion date for resolving the issue. This would allow licensees to complete the necessary sump inspections, evaluate the data gathered using NRC approved guidance, identify modifications if any, and procure and install materials for identified modifications. The time line identified in the NEI comments support this approach.

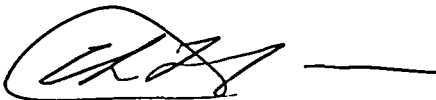
2. In addition to the above discussion, the NRC proposed schedule provides little time to address the chemical effects of an accident as required by the draft generic letter. To date no technical standards have been provided for licensees to use in evaluating these effects. EPRI, the Westinghouse Owners Group (WOG) and NRC Research are conducting experiments to determine the possible impact of chemical interactions between the fluids involved and containment equipment, coatings and insulation. As the results of these experiments will not be known until late in 2004, licensees will be constrained to address possible chemical effects by applying conservative design margin. Using the schedule proposed by NEI would provide a more reasonable amount of time to address these effects.
3. The option of providing a risk-informed resolution to the GSI-191 issue should be accommodated as well. This may mean extending the issuance of the generic letter somewhat to allow completion of discussions between the industry and the NRC to address the issue in a risk-informed manner.

Should you have any questions, please contact:

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Respectfully,



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