

RDB received 4/15/05



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Serial: PE&RAS 05-030
April 14, 2005

70 FR 9682

Michael Lesar,
Chief Rules and Directives Branch,
Office of Administration, Mail Stop T-6D59,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001.

SUBJECT: Comments on Office of Nuclear Regulatory Research Report: *Station Blackout Risk Evaluation for Nuclear Power Plants* (70 FR 9682, February 28, 2005)

Mr. Lesar:

Progress Energy is submitting the following comments related to the subject Federal Register notice.

1. One of the conclusions of the report is that severe weather is a significant contributor to station blackout core damage frequency (SBO CDF). It may be more appropriate to treat the severe weather case separately based upon actual plant practices with incoming or predicted severe weather. Examples of plant practices and procedure requirements include plant shutdowns, restoration of risk significant equipment, and start testing and restoration to standby of the emergency diesel generators. In many cases other emergency power supplies that are not safety related systems are brought up to a heightened state of readiness. This further reduces the SBO CDF from severe weather.
2. It is not clear from the report if the frequency increase for a summer loss of off-site power (LOOP) is regional dependent or not.
3. It appears that the impact of Maintenance Rule (10 CFR 50.65) implementation resulting in Emergency Diesel Generator (EDG) performance improvements has not been considered. It should be recognized that implementation of the Maintenance Rule resulted in more stringent EDG performance requirement targets than the SBO Rule. In addition, implementation of Maintenance Rule Risk Assessments (10 CFR 50.65(a)(4)) for work week scheduling has contributed to scheduling of EDG maintenance tasks outside of time periods where risks to offsite power availability are known to be present. It may be more constructive to focus on Maintenance Rule Risk Assessment adjustments regarding EDG maintenance task scheduling than to block out periods of time based on the season of the year. This will ensure proper consideration of increased risks to offsite power availability throughout the year without unnecessary restrictions during mild summers.

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-63
Add D. Rasmussen (DMR)

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Groblewski', with a stylized, flowing script.

Tony Groblewski
Supervisor - Corporate Regulatory Affairs

TG/kmh

From: "Heffner, Ken" <ken.heffner@pgnmail.com>
To: <nrcprep@nrc.gov>
Date: Thu, Apr 14, 2005 4:51 PM
Subject: Progress Energy Comments on 70 FR 9682

The attached is Progress Energy's comments on 69 FR 9682 - Station Blackout Risk Evaluation for Nuclear Power Plants.

Kenneth M. Heffner
Lead Engineer
Progress Energy
Corporate Regulatory Affairs
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<<05-030 Letter Groblewski - NRC comments on SBO Risk Evaluation.pdf>>

CC: "Groblewski, Tony" <tony.groblewski@pgnmail.com>

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Subject: Progress Energy Comments on 70 FR 9682
Creation Date: Thu, Apr 14, 2005 4:01 PM
From: "Heffner, Ken" <ken.heffner@pgnmail.com>

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