AmerGen SM

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Exelon.

An Exelon Company
AmerGen Energy Company, LLC
4300 Winfield Road
Warrenville, IL 60555

www.exeloncorp.com

Nuclear
Exelon Generation
4300 Winfield Road
Warrenville, IL 60555

2005 OCT 26 PM 2:44

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October 20, 2005

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70FR49953

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Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments Concerning Draft Regulatory Guide DG-1128 *"Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants"* (70FR49953, dated August 25, 2005)

Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC are submitting this letter in response to a request from the Nuclear Regulatory Commission (NRC) for comments concerning Draft Regulatory Guide DG -1128, *"Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants,"* which was published in the Federal Register (i.e., 70FR49953, dated August 25, 2005).

DG-1128 contains proposed Revision 4 of Regulatory Guide (RG) 1.97, *"Criteria for Monitoring Instrumentation for Nuclear Power Plants,"* and describes a method that the NRC staff considers acceptable for use in complying with the applicable regulations with respect to satisfying criteria for accident monitoring instrumentation in nuclear power plants. This proposed revision to the RG 1.97 represents an ongoing evolution in the nuclear industry's thinking and approaches regarding accident monitoring systems in nuclear power plants. Specifically, DG-1128 endorses guidance and criteria established in the Institute of Electrical and Electronics Engineers (IEEE) Standard 497-2002, "IEEE Standard Criteria for Accident Monitoring Instrumentation for Nuclear Power Generating Stations," with certain clarifying regulatory positions specified in Section C of the DG.

EGC and AmerGen appreciate the opportunity to comment on DG-1128, and offer the following comment for consideration by the NRC.

> Regulatory Position C (1) in the DG may impose an unnecessarily restrictive condition by requiring a plant's entire accident monitoring program to meet the requirements of Revision 4 of the RG as part of a voluntary conversion of a current operating reactor to the new criteria. EGC/AmerGen agree that the analysis of variables should be comprehensive and include all variables, given that an incomplete analysis could create the potential for loss of variables or loss of interactions with other variables. However, the design and qualification criteria should recognize the acceptability of the plant's current licensing basis. For

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example, the electrical separation guidelines specified in Section 6.3.d of IEEE Standard 497-2002, require use of IEEE 384-1992, "Criteria for Independence of Class 1E Equipment and Circuits." Current licensees meet electrical separation requirements per their current licensing basis, but do not necessarily meet specific requirements of IEEE 384-1992. There does not appear to be a benefit in requiring licensees to justify deviations from IEEE 384-1992 and requiring NRC review of these deviations when voluntarily converting to Revision 4 of the RG.

Therefore, EGC/AmerGen suggest that Regulatory Position C (1) in the DG be revised to include the following statement: *"If a current operating reactor licensee voluntarily converts to the criteria in Revision 4 of this guide, the licensee should perform the conversion by evaluating all accident monitoring variables. When alternate requirements applicable to a design or qualification criteria are provided in the plant's current licensing basis, it is acceptable to apply these requirements to the voluntary conversion."*

If you have any questions or require additional information, please do not hesitate to contact Mr. Richard Gropp at 610-765-5557.

Sincerely,

Pamela B. Cowan
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC
AmerGen Energy Company, LLC