



**DOCKET NUMBER**  
**PROPOSED RULE** 50  
(70FR 67598)

DOCKETED  
USNRC

March 7, 2006 (2:19pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

March 3, 2006

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

GL06-004

**ATTN:** Rulemakings and Adjudications Staff

**SUBJECT:** Comments on Proposed Rule 10 CFR Part 50, RIN 3150-AH29,  
*Risk-Informed Changes to Loss-of-Coolant-Accident Technical  
Requirements (70 Federal Register 67598, November 7, 2005)*

Virginia Electric and Power Company (Dominion), Dominion Nuclear Connecticut, Inc. (DNC), and Dominion Energy Kewaunee, Inc. (DEK) appreciate the opportunity to comment on the subject proposed rule. We commend the NRC for moving to the proposed rule stage of this important effort that proposes a voluntary alternative to the existing 10 CFR 50.46 rule. This voluntary alternative establishes a more realistic yet still conservative design basis break size for analyzing the performance of Emergency Core Cooling Systems (ECCS) during loss of coolant accidents (LOCA).

While Dominion fully supports the concept of redefining the large break LOCA embodied in this rulemaking, the rule as currently proposed is excessively burdensome, particularly in the areas of operational restrictions and the risk-informed integrated safety performance assessment process. As currently proposed, Dominion would not implement this voluntary alternative to the existing 10 CFR 50.46 rule.

Dominion fully endorses the detailed comments provided by the Westinghouse Owners Group and the Nuclear Energy Institute on this proposed rulemaking. The viability of this voluntary alternative to the existing 10 CFR 50.46 rule will be contingent upon how these comments are addressed.

Template = SECY-067

SECY-02

If you have any questions or would like further information, please contact:

Mr. Dave Bajumpaa

David\_A\_Bajumpaa@dom.com, or 860/447-1791 or

Mr. Don Olson

Don\_Olson@dom.com, or 804/273-2830

Respectfully,

A handwritten signature in black ink that reads "Edward Brennan Jr. for". The signature is written in a cursive style.

C. L. Funderburk, Director  
Nuclear Licensing & Operations Support  
Dominion Resources Services, Inc. for  
Virginia Electric and Power Company,  
Dominion Nuclear Connecticut, Inc. and  
Dominion Energy Kewaunee, Inc.

**From:** Carol Gallagher  
**To:** Evangeline Ngbea  
**Date:** Tue, Mar 7, 2006 10:07 AM  
**Subject:** Comment letter on Proposed Rule - Risk-Informed Changes to LOCA Technical Requirements

Attached for docketing is a comment letter on the above noted proposed rule from C. L. Funderburk, Dominion Resources Services, Inc., that I received via the rulemaking website on 3/7/06.

Carol

**Mail Envelope Properties** (440DA19A.6B3 : 3 : 886)

**Subject:** Comment letter on Proposed Rule - Risk-Informed Changes to LOCA  
Technical Requirements  
**Creation Date:** 3/7/06 10:07AM  
**From:** Carol Gallagher  
**Created By:** CAG@nrc.gov

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1434-0002.pdf	58200	03/07/06 10:03AM

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