Comments on Draft Regulatory Guide DG-1153

Submitted by: Progress Energy, Nuclear Engineering & Services Department, Chief Engineers Section

Please consider the following changes to selected text shown below when viewed using MS Word "tracking changes".

The intent of the proposed changes is to clarify that contingencies other than the nuclear plant trip (such as non-nuclear plant trip and transmission contingencies), which have been predicted to result in an unacceptable offsite power supply but have not actually occurred do not make offsite power inoperable. Realization of such a contingency, however, would result in offsite power inoperability. This is in contrast to a prediction that a nuclear plant trip contingency would result in inadequate offsite power. In this case offsite power becomes inoperable upon knowing that the nuclear plant trip would make it inoperable if the trip were to occur. This is because an accident such as a LOCA would result in a nuclear plant trip but would not be expected to result in realization of contingencies other than the nuclear plant trip (such as non-nuclear plant trip and transmission contingencies).

Your attention to this matter is greatly appreciated.

The TSs of operating nuclear power plants include the operational restrictions resulting from the loss of power sources. In general, plant TSs require the operability of the offsite power system as a part of the LCO and specify actions to be taken when the offsite power system is inoperable. Plant operators should be aware of (1) the capability of the offsite power system to supply power during operation, and (2) situations that can result in a loss of offsite power or inadequate voltage following a trip of the nuclear plant or other transmission contingencies predicted by the grid operator that can result in a loss of offsite power or inadequate voltage. If the offsite power system is not capable of providing the requisite power in the postulated event of a nuclear plant trip or actual occurrence of other transmission contingencies, the system should be declared inoperable and pertinent plant TS provisions should be followed.

Deleted: identified

Deleted: either situation

The operational restrictions in the TSs are based on the following three assumptions:
(1) The LCO of nuclear power plants are met when all electric power sources required by GDC 17 are available at the required voltage and capacity for the nuclear station and capable of withstanding a loss of generation by the nuclear unit, or (b) supporting safe shutdown following a loss of power from the transmission network and the loss of one train of onsite ac power.

Deleted: system contingency such as (a) a single failure involving

Deleted: , any other critical generation source, or loss of power from a transmission system element,

Deleted: a double failure involving

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