

Doris Mendiola - NEI Comments on Draft Regulatory Guide DG-1156, "Seismic Design Classification"

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SUBJECT: NEI COMMENTS ON DRAFT REGULATORY GUIDE DG-1156, "SEISMIC DESIGN CLASSIFICATION"

PROJECT NUMBER: 689

The Nuclear Energy Institute wants to thank you for the opportunity to review the subject draft Regulatory Guide. It is understood that this draft will replace the existing Regulatory Guide 1.29.

In general, Draft Regulatory Guide DG-1156 has only minor changes from the existing Regulatory Guide 1.29; however, the following general and specific comments are offered to improve the draft Regulatory Guide:

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GENERAL COMMENTS

1. The draft guide changes many of the "should" statements of Regulatory Guide 1.29 to "must" statements (first paragraph of Section B and the first sentence in Section C). The wording change provides clarity in view of the definitions used for "should" and "must" in industry standards.
2. The industry concurs with the Staff's assessment in the regulatory analysis that Regulatory Guide 1.29 should be revised. The industry also concurs that the wording of Section B is sufficient for implementing the voluntary regulation 10 CFR 50.69.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear materials licensees, and other organizations and individuals involved in the nuclear energy industry.

SPECIFIC COMMENTS

1. In Section A, third paragraph Appendix A to 10 CFR 100 is mentioned. This appendix is not applicable to new plants because 10 CFR 100.23 states, "The requirements in paragraphs (c) and (d) of this section apply to applicants for an early site permit or combined license pursuant to Part 52 of this chapter, or a construction permit or operating license for a nuclear power plant pursuant to Part 50 of this chapter on or after January 10, 1997. However, for either an operating license applicant or holder whose construction permit was issued prior to January 10, 1997, the seismic and geologic siting criteria in Appendix A to Part 100 of this chapter continues to apply." It is recommended that the discussion be updated to address new plants as well as the existing ones.
2. The word "seal" from Regulatory Guide 1.29 has been changed to "sealed" in the draft in Section C.1.h. This leaves a misunderstanding that "sealed" systems are the subject when "seal" or "sealing" water systems are the correct subject. It is recommended that the original wording of Regulatory Guide 1.29 be used or if a wording change is desired, the word "sealing" be used.
3. Section C.1.p refers to Regulatory Guides 1.3 and 1.4. For new plants, these Regulatory Guides are superseded by Regulatory Guide 1.183. The discussion should be updated to address the new plants as well as existing ones.
4. Regulatory Position C.1.e appears to have a textual editing problem with the fonts for "but not" in the second line.

If you have any further questions regarding these comments, please contact me at 202.739.8094; aph@nei.org.

Sincerely,



Adrian P. Heymer

c: Mr. Stephen C. O'Connor
Mr. Ata Istar
NRC Document Control Desk

From: SECY
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