

**Staff Responses to Public Comments on Draft Regulatory Guide DG-1160  
(Proposed Revision 1 of Regulation Guide 1.112)**  
(Public comments have been edited for clarity)

The following presents a summary of key comments received from the Nuclear Energy Institute (ML063560032) and the NRC responses.

Comments			NRC Comment Resolution
Originator	DG-1160 Section	Specific Comments	
Nuclear Energy Institute (NEI)	Introduction (comment 1)	The Westinghouse AP1000 and the General Electric ABWR certified designs both reference an earlier version (1984) of ANSI/ANS 18.1 than that being proposed by the NRC staff in the draft regulatory guide (the version dated 1999). Combined license applicants referring to a certified design are not required to recalculate liquid and gaseous effluent source terms using a different standard from that employed in the respective certified design because the certified design, including the calculated liquid and gaseous effluent source terms, has already been determined by the NRC to provide reasonable assurance of adequate protection of public health and safety.	The proposed revision to RG 1.112 would not be applicable to designs already certified under 10 CFR Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants," and applicants for combined operating licenses (COL) would not be required to recalculate liquid and gaseous effluent source terms when referring to reactor designs already certified in 10 CFR Part 52.
NEI	general (comment 2)	We are concerned that the NRC is embarking on a piecemeal and untimely approach to updating the framework for regulating radiological effluents from nuclear power plants. Such an approach will unnecessarily complicate design certification, licensing, and eventual operation for new nuclear power plants. We encourage NRC to pursue such an effort in a comprehensive and well-coordinated manner—considering all of the applicable regulations, guidance, and standards.	<p>The NRC staff is initiating a comprehensive effort to revise several guides and supporting documents related to RG 1.112. This plan will be shared with stakeholders and includes integration of all relevant computer codes used in the context of compliance with 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." This approach is intended to prevent ad hoc revisions of computer codes, regulatory guides, and supporting documentation. Included in this effort are options to update the framework for regulating radiological effluents from nuclear power plants.</p> <p>However, the staff believes there is value added to the COL application review process by revising the reference to standard ANSI/ANS 18.1 in the regulatory guide to reflect its latest version (ANSI/ANS-1999). This action will eliminate any uncertainty and inconsistency concerning which standard should be used for new applications.</p>