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RULES AND DIRECTIVES
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Comments on Draft Regulatory Guide DG-1173, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage"

The NRC noted that public comments are being solicited on Draft Regulatory Guide DG-1157, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage Damping Values for Seismic Design of Nuclear Power Plants," (including any implementation schedule) and its associated regulatory analysis or value/impact statement. The NRC also noted that comments will be most helpful if received by August 20, 2007. AREVA NP Inc. (AREVA NP) appreciates the opportunity to provide comments on DG-1173.

AREVA NP has the following specific comments:

Regulatory Position 8, 1st paragraph, sub-step (a) should be revised to state "monitoring sump level or flow" to be consistent with the specification of "two" in the first paragraph. It is assumed that Regulatory Position 8, 1st paragraph, sub-step (b) is the second required method.

Regulatory Position 9 contains two separate regulatory positions. AREVA NP recommends that the two sentences be separated into individual regulatory positions to eliminate confusion regarding whether the two requirements are related in some manner. The phrase "In addition" should be deleted from the second sentence.

In the discussion of capabilities on page 9, DG-1173 has the following statement:

The overall response time of at least one leakage monitoring system should be sufficient to support leak-before-break (LBB) monitoring (if LBB is approved for the plant), such that sufficient time will be available for operators to place the facility in a safe condition prior to any potential gross structural failure of the leaking component."

*SONSE Review Complete
Template = ADM-013*

*FRIDS = ADM-03
ALL = M. Srinivasan
(MX55)*

AREVA NP INC.

An AREVA and Siemens company

This capability is also referenced in Regulatory Position 9. AREVA NP recommends that the capability guidance for the LBB detection system be revised to be clear that it does not necessarily have to be able to detect the leakage determined from the LBB analysis within 1 hour. Rather, AREVA NP believes that the detection capability should be addressed in plant procedures and would be based on the type of detection system and its location.

Sincerely,


Ronnie L. Gardner, Manager
Site Operations and Corporate Regulatory Affairs
AREVA NP Inc.

cc: L. Burkhart
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Project 733