

Dominion Resources Services, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060
Web Address: www.dom.com

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U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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ATTN: Rulemaking, Directives, and Editing Branch

7/31/07
72 FR 41794

**COMMENTS ON DRAFT REGULATORY GUIDE DG-4012,
"MINIMIZATION OF CONTAMINATION AND RADIOACTIVE
WASTE GENERATION – LIFE CYCLE PLANNING"
(FEDERAL REGISTER VOLUME 72, NUMBER 146
DATED JULY 31, 2007, PAGE 41794)**

①

Virginia Electric and Power Company (Dominion), Dominion Nuclear Connecticut, Inc. (DNC), and Dominion Energy Kewaunee, Inc. (DEK) appreciate the opportunity to comment on Draft Regulatory Guide DG-4012, "Minimization of Contamination and Radioactive Waste Generation – Life Cycle Planning", as described in the subject *Federal Register* notice.

Page 3, Prompt Detection of Leakage. It is stated that monitoring and routine surveillance programs are an important part on minimizing potential contamination. Preventive Maintenance (PMs) and worker practices should be included in the statement as well.

Page 3, Avoid Release of Contamination from Undetected Leaks. It would be useful to include example(s) of leak detection systems and quantify what constitutes as "minor" leaks.

C.1. Consider a recommendation for the use of television cameras in areas not readily or frequently accessed. This would aid in the early identification of leaks which should minimize contamination of plant areas. Use of cameras should also result in lower radiation exposures to personnel during operations.

Page 5, C.1.g. Recommend stating that during the design and/or process selection activity, if possible, processes should be selected that eliminate streams that have the potential of "encrustation of precipitates" or crystallization at ambient temperatures. The latter would eliminate the need for heat tracing, the failure of which could result in line blockages.

SOUSI Review Complete
Template = ADM-013

E-REDS = ADM-013
Add = E. O' Donnell (exo)

Page 7, C.1.v. Revise sentence to read "Drains from locker rooms and clean-up showers *in personnel decontamination areas* should be routed to radwaste processing facilities to prevent the reconcentration of radioactive materials in onsite sewage plants."

Page 10, C.2.q. Revise sentence to read "Backfill should *be obtained from areas that do not contain* concentrations of radioactive material above natural background levels."

Page 10, C.2.w. Revise sentence to read "Procedures for mitigation, if contamination is detected, should include use of the conceptual site model and monitoring information to develop event specific models of contaminant migration before the selection of a remediation strategy, *as deemed necessary.*" Groundwater and/or soil remediation action will not be necessary for every detection of contamination.

Page 10, C.2.x. Revise sentence to read "Design and operation of ground-water capture zones surrounding SSCs should provide, when deemed appropriate, effective means to isolate and collect liquid contaminants." As currently worded the term "ground-water capture zones" implies the process has an effect on a contaminant before it enters the ground-water (i.e., prevents abnormal release to ground-water).

Page 11, C.3.c. Recommend the last sentence regarding global positioning system (GPS) readings be eliminated. Obtaining reliable GPS readings within certain SSC's are not practicable due to structural interference with signal quality.

Page 12, C.4.a. Recommend measure be eliminated. The purpose of the draft Regulatory Guide is minimization of radioactive waste generated. Volume reduction systems in themselves do not minimize the generation of waste, but are an after the fact process. Minimization takes place at the point of generation. For example, only equipment or materials absolutely needed to perform work should be allowed in contaminated areas, etc.

Page 12, C.4.b. After first sentence, insert "Waste streams may be blended if necessary prior to transportation to meet disposal facility criteria."

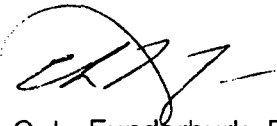
General comment: Recommend that NEI 07-07, Industry Groundwater Protection Initiative Final Guidance Document, June, 2007 be reviewed for possible alignment with the draft Regulatory Guide.

If you would like further information, please contact either:

Lee Thomasson Lee.Thomasson@dom.com or (804) 273-3066

Don Olson Don.Olson@dom.com or (804) 273-2830

Respectfully,



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.

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From: <Vicki.Hull@dom.com>

Created By: Vicki.Hull@dom.com

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