NRCREP Resource

From: BELL, Denise [dxb@nei.org] on behalf of RILEY, Jim [jhr@nei.org]
Sent: Friday, July 25, 2008 1:25 PM
Subject: Draft Regulatory Guide DG-1195, "Availability of Electric Power Sources"
Attachments: 07-25-2008_NRC_Draft Regulatory Guide DG-1195.pdf; 07-25-2008_NRC_Draft Regulatory Guide DG-1195 - Industry Comments_Enclosure.pdf

July 25, 2008

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Rulemaking, Directives, and Editing Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Draft Regulatory Guide DG-1195, *"Availability of Electric Power Sources,"* Request for Comment.

Project Number: 689

The Nuclear Energy Institute (NEI),on behalf on the nuclear industry, is submitting the following response to the *Federal Register* notice, dated May 22, 2008, *Volume 73, Number 100,* which invited written comments on the Proposed Revision 1 of Regulatory Guide 1.93 (DG-1195), *"Availability of Electric Power Sources".*

NEI's primary comment is that DG-1195 should not be issued. In fact, Regulatory Guide 1.93 should be removed from inventory since it has been superseded by other guidance. In 1992, the NRC issued the improved Standard Technical Specifications to clarify the content and form of requirements necessary to ensure safe operation of nuclear power plants in accordance with 10CFR50.36. The NUREG 1430-1434 series that created specific Technical Specifications has superseded the need for the 1974 Regulatory Guide 1.93 and its proposed revision (DG-1195).

To a large extent, Regulatory Guide 1.93 contains the same information as the AC power sources Technical Specifications and their basis. The appropriate location for this information is in the Technical Specifications NUREGs and not in a Regulatory Guide. In fact, there is a possibility that having such information in two places will lead to inconsistency and confusion. It is important to note that this Regulatory Guide is not needed for new plants either, since Technical Specifications for new plant designs can follow the well established process used for current plant Standard Technical Specifications (STS). In addition, industry operating experience, including generic communications such as bulletins and generic letters, are addressed as part of the COL application and review process.

Sincerely,

James H. Riley

SUNSI Review Complete
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E-RIDS = ADM-03
Add = M. ORR (mpo1)
S. AGGARWAL (ska)

Enclosure

James H. Riley
Director, Engineering

Nuclear Energy Institute
1776 I Street NW, Suite 400
Washington, DC 20006
www.nei.org

P: 202-739-8137
F: 202-785-4019
M: 202-439-2459
E: jhr@nei.org

nuclear. clean air energy.

NUCLEAR ENERGY INSTITUTE

James H. Riley
DIRECTOR
ENGINEERING
NUCLEAR GENERATION DIVISION

July 25, 2008

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[1] NEI is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry. 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 material licensees, and other organizations and individuals involved in the nuclear energy industry.

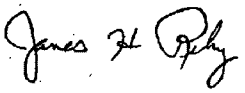
1776 I Street, NW | Suite 400 | Washington, DC | 20006-3708 | P: 202.739.8137 | F: 202. 533.0193 | jhr@nei.org | www.nei.org

Technical Specifications (STS). In addition, industry operating experience, including generic communications such as bulletins and generic letters, are addressed as part of the COL application and review process.

Should our primary comment not be accepted, the enclosure provides additional comments and recommendations from the NEI Grid Reliability Task Force.

We appreciate the opportunity to comment on the draft documents. If you have any questions regarding this effort, please contact me at (202) 739-8137; jhr@nei.org or Gordon Clefton at (202) 739-8086; gac@nei.org .

Sincerely,



James H. Riley

Enclosure

c: Mr. William E. Kemper, NRR/ADES/DE/EICB, NRC
Mr. Satish K. Aggarwal, RES/DE/MEEB, NRC
Mr. Stephen C. O'Connor, RES/DE/RGDB, NRC
NRC Document Control Desk

ENCLOSURE

DG-1195 Industry Comments

Item Number	DG Location	DG Proposed Text	Suggested Text	Comments/References/Regulatory Basis
				DG-1195 should include some reference to Part 52, since it is addressing the passive plant designs. Currently it only recognizes Part 50.
	General			The three categories of electrical power sources are: • Offsite AC, • Onsite AC (diesel-generators) and • Onsite DC. Both the ESBWR and AP-1000 Design Certification Documents (DCDs) state that RG 1.93 revision 0 is only applicable for the safety-related DC systems. Neither design utilizes any safety related AC systems for design basis event mitigation.
	General		Any changes to RG 1.93 need to be aligned with changes to the NUREGs for Standard Technical Specifications.	Technical specifications for the GE Advanced Boiling Water Reactor (ABWR) and ESBWR were developed based on NUREG 1434, Standard Technical Specifications for GE BWR/6. The Westinghouse AP1000 PWR developed its technical specifications based on NUREG 1431, Standard Technical Specifications for Westinghouse PWRs. The action times for the various systems being below LCO requirements are identical for the DG and the NUREG. The major differences between the NUREGs and the DG are that the revised DG requires additional evaluation type actions to support the action completion times. For example, for offsite sources being one less than the LCO, the operator is required to evaluate the grid capability to support continued operation for the one source. When

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				an onsite source system (diesel generator) is one less than the LCO, the other emergency diesel generator (EDG) must be evaluated to eliminate common cause failure potentials.
	General		Revise NUREG series 1430-1434	This DG includes changes that would impact existing Technical Specifications. The NUREG series 1430-1434 contain the improved Standard Technical Specifications (STS); TS changes go through the TSTF Travelers process.
	General		Stay within GDC-17	The language in this DG seems to expand upon past interpretations and applications of GDC-17. It also implies when a unit must enter an LCO related to degradation of the offsite power sources to the unit.
	General			There is no IEEE Standard that parallels RG 1.93.
	General			There is nothing wrong with RG 1.93 for existing units and new units being subject to GDC-17. This RG would only be applicable to the advanced passive designs from the DC perspective.
	General			Include a section to clearly differentiate terms such as transmission network, transmission system, and offsite power system. Consider adoption of terms used in IEEE Std 765-2006. Replace use of the word "grid" with "transmission network" or define it as the same thing.
	Generic	This DG uses "plant" instead of "unit"	Substitute "unit" for "plant"	The DG should be applied on a "unit" basis as RG 1.93's previous wording, not on a "plant" basis, since actions are taken on a unit level.
	Page 1, Section A, 3rd paragraph:			The two independent circuits are called "sources". They are not sources, but circuits connecting the safety buses to the transmission network which is normally a common source for both circuits. Eliminate use of the term "source" when referring to the two required circuits or the offsite power system which does not include the transmission network or its power sources.

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	Page 2, Section B.1, 1st paragraph:			Being one transmission network contingency away from having inadequate voltage does not mean that the offsite power system is inoperable, only that it has the potential for being so. For a contingency that is the trip of the nuclear unit, it is appropriate to assume inoperability if it would result in inadequate offsite power. A trip of the nuclear unit along with another event should be considered two contingencies unless the single event can result in the trip of the nuclear unit.
	Page 2, Section B.1, 1st paragraph:			While this discussion of an inoperable "offsite power system" is included, there is no corresponding LCO section that applies to the "transmission network".
	Page 3, Section B.1, 2nd paragraph:			The NERC standard (NUC-001-1) will set the interface requirements between the grid system operator and the nuclear plant operator. The nuclear plant operator is required to incorporate information received via this interface into decisions made at the nuclear plant. The plant operator does not have the capability to monitor the status of the grid as stated here but receives information from the grid system operator.
	Page 3, Section B.1, 3rd paragraph:		Passive plants are not required to have any technical specification requirements for their offsite ac source(s) because passive plant designs rely on passive safety-related systems for core cooling and containment integrity.	The first sentence in this paragraph is somewhat confusing and seems to mix two separate issues: GDC 17 and offsite power Technical Specifications for passive plants. To paraphrase, the sentence states that any passive plant is not required to have tech specs on offsite power. A discussion of GDC 17 in this sentence is not required and adds unnecessary confusion to the statement, as the statement is completely independent of whether the design has an exemption from GDC 17 or not.
	Page 4, Section B.3.1,			This discussion uses the term "sources" when it is really discussing the two "circuits" of the offsite power system. It

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	1st paragraph:			then uses the phase "remaining offsite power system" as though there were more than one. Use consistent terms to eliminate confusion. The last sentence is confusing since it uses the term "source" in an inappropriate manner. This confusion continues in many other sections. If one of the two circuits is lost, the plant operator should know about it fairly quickly. Contingency analysis has no role in detecting a loss or returning a circuit to service.
	Page 5, Section B.3.1, 3rd & 4th paragraphs:			This discussion uses the term "source" when it is really discussing the two offsite "circuits".
	Page 7, Section B.3.7, 1st paragraph:			There are many things that can cause reactor trips. This is the wrong term. Address loss of a redundant safety function instead.
	Page 7, Section C.a:			There should be an explanation of acceptable methods to verify "capacity" of the offsite power system and its two required circuits.
	Page 8, Section C.4:			Position 4 deals with a loss of one offsite and one onsite AC source. The action here sends the licensee back to Position 1 given the restoration of either. Position 1 deals with the loss of one offsite source, not an onsite source. Position 2 deals with the loss of one onsite source. For this to be correct, it would require the LCO for the two to be the same.