



NUCLEAR ENERGY INSTITUTE

James H. Riley  
DIRECTOR  
ENGINEERING  
NUCLEAR GENERATION DIVISION

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September 5th, 2008

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

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**Subject:** Comments on Draft Regulatory Guide DG-1198, "Physical Models for Design and Operation of Hydraulic Structures and Systems for Nuclear Power Plants," 73 Federal Register 15695 (July 10, 2008) and Corresponding NRC Staff Draft Final Rule Language

**Project Number: 689**

On July 10, 2008, the NRC issued a Federal Register notice (73 FR 15695) soliciting public comments on DG-1198 "Physical Models for Design and Operation of Hydraulic Structures and Systems for Nuclear Power Plants."

The draft regulatory guide DG-1198 provides an update to Regulatory Guide 1.125 (1978) and describes the detail and documentation of data and studies that an applicant should include in the PSAR or the FSAR to support the use of physical hydraulic model testing for predicting the performance of hydraulic structures and systems for nuclear power plants. The regulatory position of this guide is applicable only to physical models used to predict the action or interaction of surface waters with features located outside of containment. The recommendations of this guide do not apply to internal plant systems or structures.

The Nuclear Energy Institute (NEI) has solicited comments from the industry and appreciates the opportunity to submit the following for consideration:

1. RG 1.125 only applied to modeling safety-related features located outside containment. Is the intent of the DG to bound both safety and non-safety related structures?
2. The inclusion of pump designs does not appear to be consistent with the definition of hydraulic structures included in Section A of the DG. We recommend that pump designs be removed from DG-1198 or further explanation be provided on how to ensure pump designs comply with the DG.

SUNSI Review Complete

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Template = ADM-013

M. Orr (mp01)

Rulemaking, Directives, and Editing Branch

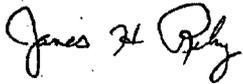
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3. Is it the intent of DG-1198 to remove investigation reports, such as the U.S. Army Experimental Waterways Station, as an acceptable means of demonstrating compliance? RG 1.125 found this kind of report to be acceptable.
4. Is it the intent of DG-1198 to encompass plants that now have FSAR vs. a PSAR? RG 1.125 applied only to PSARs.

If there are any questions regarding these comments, please contact me or Mike Melton (202.739.8048; [mam@nei.org](mailto:mam@nei.org)).

Sincerely,

A handwritten signature in cursive script that reads "James H. Riley".

James H. Riley

## NRCREP Resource

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**From:** REED, Joseph [jsr@nei.org] on behalf of RILEY, Jim [jhr@nei.org]  
**Sent:** Friday, September 05, 2008 4:50 PM  
**Subject:** Comments on Draft Regulatory Guide DG-1198, "Physical Models for Design and Operation of Hydraulic Structures and Systems for Nuclear Power Plants," 73 Federal Register 15695 (July 10, 2008) and Corresponding NRC Staff Draft Final Rule Language  
**Attachments:** 09-05-08\_NRC\_NEI Comments on Draft Regulatory Guide DG-1198.pdf

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Sincerely,

James H. Riley  
Director, Engineering  
Nuclear Generation Division

Nuclear Energy Institute  
1776 I Street NW, Suite 400  
Washington, DC 20006  
[www.nei.org](http://www.nei.org)

P: 202-739-8137

F: 202-785-4019

E: [jhr@nei.org](mailto:jhr@nei.org)

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