

Doris Mendiola

From: Michael Lesar
Sent: Thursday, October 02, 2008 6:46 AM
To: Doris Mendiola
Subject: FW: Draft Regulatory Guide: Issuance, Availability of DG-3034
Attachments: 10-01-08_NRC_Issuance, Availability of DG-3034.pdf

From: BELL, Denise [mailto:dxh@nei.org] **On Behalf Of** KILLAR, Felix
Sent: Wednesday, October 01, 2008 4:46 PM
Subject: Draft Regulatory Guide: Issuance, Availability of DG-3034

October 1, 2008

Mr. Timothy C. Johnson
Senior Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop EBB-E2 C40
Washington, DC 20555-0001

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RULES AND DIRECTIVES
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NRC

Subject: Draft Regulatory Guide: Issuance, Availability of DG-3034, "General Design Guide for Ventilation Systems of Plutonium Processing and Fuel Fabrication Plants"

Project Number: 689

Dear Mr. Johnson:

The Nuclear Energy Institute (NEI) submits the following comments on the Draft Regulatory Guide DG-3034, "General Design Guide for Ventilation Systems of Plutonium Processing and Fuel Fabrication Plants" (July 2008). The following specific comments are based on industry input from NEI members and are offered for your consideration in finalizing the Regulatory Guide.

Section 1: General Safety

- c. Third sentence - Considering changing "that may contain plutonium" to "that may contain dispersible plutonium."
- h. Last sentence – Considering changing "protect shutdown systems" to "protect systems that are shut down" for clarification.

Section 3: Process Ventilation System

- c. Recommend that the section be revised to allow a glove box confinement capability based on results of the plant-specific Integrated Safety Analysis (ISA). In some cases, the "credible" breach would drive a large airflow capacity; whereas the option to make these events Highly Unlikely should be addressed.

SUNSE Review Complete

Temp title = ADM-013

E-REDS = ADM-03

Add = T. Johnson (TJS)

Sincerely,

Felix M. Killar, Jr.

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Senior Director, Fuel Supply/Material Licensees
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October 1, 2008

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¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Mr. Timothy C. Johnson

October 1, 2008

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the "credible" breach would drive a large airflow capacity; whereas the option to make these events Highly Unlikely should be addressed.

Section 4: Fans

- a. First sentence, consider changing "redundant fans" to "installed spare fans."
- c. Recommend that the section be revised to remove the term Items Relied on for Safety (IROFS). In many cases, supply fans are not required to maintain the confinement and are not identified as IROFS. However these fans should still be interlocked to prevent supply fan operation without exhaust fan operation and the resultant pressurization of facility confinement zones. Another option would be to discuss the fans in terms of the ISA.

Section 5: Ventilation System Construction and Layout

- a. Suggest rephrasing the last sentence to state that only final filter assemblies and duct work, that represent a barrier to the environment, should be designed to AG-1. Another option would be to suggest that the layout simply be consistent with the ISA.
- b. Same comment as 5a.

Section 6: Ventilation System Inspection, Testing, and Monitoring

- b. Suggest clarifying that the intent of the Regulatory Guide is not to designate the continuous air monitoring system (CAMS) as an IROFS just because it supports a ventilation system that is an IROFS. CAMS IROFS designation (if there is one) would be consistent with the results of the ISA.

Thank you for the opportunity to comment on DG-3034. If we can provide further information to assist in resolving these comments, please contact me at 202-739-8126; fmk@nei.org.

Sincerely,



Felix M. Killar, Jr.

c: Mr. Michael T. Lesar, ADM/DAS/RDEB, NRC