



NUCLEAR ENERGY INSTITUTE

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James H. Riley
DIRECTOR
ENGINEERING
NUCLEAR GENERATION DIVISION

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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-1178, "Instrument Sensing Lines," *73 Federal Register 74531* (December 8, 2008).

Project Number: 689

On December 8, 2008, the NRC issued a Federal Register notice (*73 FR 74531*) soliciting public comments on DG-1178, "Instrument Sensing Lines".

This guide describes a method that the staff of the NRC considers acceptable for use in complying with the Commission's regulations with regard to the design and installation of safety-related instrument sensing lines in nuclear power plants.

The Nuclear Energy Institute (NEI) has solicited comments from the industry and appreciates the opportunity to submit the comments in the attachment.

If there are any questions regarding these comments, please contact me at 202.739.8137; jhr@nei.org or Gordon Clefton at 202.739.8086; gac@nei.org.

Sincerely,

James H. Riley

Attachment

c: Ms. Tanya M. Mensah, NRR/ADRO/DPR/PSP, NRC

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RULES AND DIRECTIVES
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SUNSI Review Complete

E-REDS=ADM-03

Template=ADM-013

Add = E. O'Donnell (EXD)
K.H. Nguyen (KH)

General Comments/Discussion

Comment 1

TVA believes that DG-1178 and the related American National Standards Institute (ANSI)/ISA-67.02.01 standard are in agreement with our plants' design criteria and standards with one exception. ANSI/ISA-67.02.01, Section 5.3, currently states "shall" for field labeling of sense lines. TVA believes field labeling of sense lines should be stated as "should."

***Reason:** Since the requirements associated with heat trace and low temperature monitoring and alarm are recommendations and have a more direct impact than labeling on sense line performance, it would be more appropriate to have the labeling as a recommendation rather than a requirement. Labeling aides configuration control, but there are alternate means for maintaining configuration control.*

Comment 2

DTE believes a separate Regulatory Guide is needed for dealing with the non-condensable gasses issue. The Regulatory Guide should incorporate the results of the analyses conducted by the BWROG as well as 15 years of BWR plants operating experience with the backfill modification in service. Combining guidance for two issues (design and non-condensable gas) into one Regulatory Guide will not serve as the best guidance.

***Reason:** The Boiler Water Reactor Owners Group (BWROG) thoroughly investigated this issue in early the 1990s and most of the BWR plants implemented a hardware fix (backfill modification) to supply a continuous purge flow to the cold reference legs. A simple compliance with the sensing lines design and installation standard will not prevent liquid degassing in the reference leg. Even properly installed instruments may be affected by the non-condensable gasses and special measures must be taken to ensure accurate water level measurements.*

Comment 3

No references are been made to identify an acceptable method for mitigating the effects of the non-condensable gasses. Such guidance should be provided.

***Reason:** Since DG-1178 states: "Provisions shall be made to mitigate the potential effects of trapped, evolved gases in sensing lines during or following depressurization events as long as the associated measurements are required for monitoring the plant or for operating the safety system", licensee is expected to mitigate the effects but is left to develop a method on its own.*