



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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

12/08/08

73 FR 74531

(3)

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON PROPOSED
DRAFT REGULATORY GUIDE (DG)-1178, INSTRUMENT SENSING LINES
(VOL. 73 FR 74531)

TVA appreciates the opportunity to review and provide comments on DG-1178.

TVA offers the following comment:

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 aids configuration control, but there are alternate means for maintaining configuration control.

If you have questions regarding our comments, please contact Rob Brown at (423) 751-7228.

Sincerely,

Fred C. Mashburn
Acting Manager, Corporate Licensing
and Industry Affairs

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