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Dominion®

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U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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RULES AND DIRECTIVES
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ATTN: Rulemaking, Directives, and Editing Branch

COMMENTS ON DRAFT REGULATORY GUIDE DG-1214,
"FIRE PROTECTION FOR NUCLEAR POWER PLANTS"

The proposed revision to Draft Regulatory Guide DG-1214, "Fire Protection for Nuclear Power Plants" describes a method acceptable to the NRC staff for complying with the regulations regarding fire protection in nuclear power plants. Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to comment on this regulatory guide and offers the attached comments for consideration.

If you would like further information on our comments, please contact:

Jack Martin

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Respectfully,

C. L. Funderburk, Director
Nuclear Licensing & Operations Support
Dominion Resources Services, Inc. for
Virginia Electric and Power Company,
Dominion Nuclear Connecticut, Inc. and
Dominion Energy Kewaunee, Inc.

Attachment

SUNSI Review Complete
Template = ADM-013

F-RIDS = ADM-03
Call = B. Servey (ras)

**Dominion Comments on Draft Regulatory Guide DG-1214
“Fire Protection for Nuclear Power Plants”**

1. Section 5.3 indicates that NEI 00-01, Revision 1, provides an acceptable deterministic methodology for the analysis of postfire safe-shutdown circuits when applied in conjunction with this regulatory guide. This revision of the regulatory guide does not provide reference to guidance on how to specifically address MSOs other than to state the expectation to address “all possible fire-induced failures that could affect the safe-shutdown success path, including multiple spurious actuations.” Additional criterion was not provided to establish a methodology to perform the necessary analysis. Whereas RIS 04-03, Revision 1, established some guidance (e.g. fire damage to no more than two separate cables for each scenario evaluated), DG-1214 does not provide any further clarification of the extent of circuit damage that is to be assumed in resolving issues from SECY 08-093. It is recommended that a reference to a guidance document be provided for performance of circuit analysis or that specific criteria be provided for use when performing the analysis, as an example NEI 00-001, Revision 2.
2. Section 5.4.4 notes that “The design basis for the control room fire should consider one spurious actuation or signal to occur before control of the plant is achieved from the alternate or dedicated shutdown system.” This criterion should not be limited solely to control room fires, but should also be included in Section 5.4.3.2, Spurious Actuation Circuits, for general application. The design basis for all alternate and dedicated areas should include the consideration of one spurious actuation or signal to occur before the control of the plant is achieved from the alternate or dedicated shutdown system, not just control room.
3. The first paragraph in Section 5.4.3.2 notes that “fire-induced spurious actuations of components included in the safe shutdown success path should be prevented using the methods described in Regulatory Position 5.3.1.1,” but Section 5.4 is applicable to alternate and dedicated shutdown capability, a topic that has historically been addressed with many plant-specific alternatives consistent with Appendix R, III.G.3. Additionally, the items listed following this statement imply that additional means are available other than those listed in 5.3.1.1. It is recommended that the reference be revised from Regulatory Position 5.3.1.1 to 5.3.1.