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ATTN: Rulemaking, Directives, and Editing Branch

**COMMENTS ON DRAFT REGULATORY GUIDE DG-1192,
REQUEST FOR INCLUSION OF ASME CODE CASE N-513-3
PROPOSED REVISION 16 OF REGULATORY GUIDE 1.147,
DATED OCTOBER 2007)**

Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to comment on this regulatory guide and offers the attached comments for consideration.

Table 1 of the current Regulatory Guide (RG) 1.147, Rev. 15 and the Proposed Draft Guide (DG) DG-1192, titled; "*Table 1. Acceptable Section XI Code Cases,*" lists Code Case Number N-513-2, "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping, Section XI, Division 1," date of Supplement/Edition 2/20/04. In October 2008, 10 CFR 50.55a was changed to require the use of the 2004 Edition of Section XI as the latest approved and mandated version of Section XI in 10 CFR 50.55a(b). Within the 2004 Edition of Section XI, the following requirement exists:

"IWA-2441(b) Code Cases shall be applicable to the Edition and Addenda specified in the Inspection Plan."

For licensees that have updated their Inservice Inspection (ISI) plans to meet the 2004 Edition of Section XI, Code Case N-513-2 is no longer allowed. The Code applicability for Code Case N-513-2 is limited to the 2003 Addenda of Section XI. To resolve this issue, ASME has recently published Code Case N-513-3 in Supplement 8 of the ASME Nuclear Code Cases Book. This revision includes applicability up to the 2008 Addenda of Section XI, which alleviates the applicability issue from the ASME perspective. However, because Code Case N-513-3 was only recently published by ASME, it has not been proposed for inclusion into the proposed DG-1192. Dominion requests the NRC to expedite approval of Code Case N-513-3 for incorporation into DG-1192 and ultimately into RG 1.147, Rev. 16.

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The expedited approval is requested to support the immediate use of Code Case N-513-3 for code system leakage tests and in operational leakage events. Expedited incorporation into RG 1.147, Rev. 16, will preclude the administrative burden of submitting alternative requests to use the Code Case for licensees using the 2004 Edition of ASME Section XI per 10 CFR 50.55a(a)(3).

If you would like further information on our comments, please contact Mr. Alex McNeill at (804) 273-2528 or Alex.McNeill@dom.com.

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.