



NUCLEAR ENERGY INSTITUTE

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11/12/09

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December 14, 2009

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Mr. Michael T. Lesar
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Washington, DC 20555-0001

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Subject: Industry Comments on Draft Interim Staff Guidance on Review of Evaluation to Address Gas Accumulation Issues in Safety Related Systems (ISG-19), Docket ID NRC-2009-0494

Project Number: 689

The Nuclear Energy Institute (NEI)¹ is pleased to provide the following industry comments on the subject draft Interim Staff Guidance (ISG-19).

Draft ISG-19 contains high-level, general review criteria to address gas accumulation in safety-related systems, but it does not identify the specific guidance that will be incorporated into the Standard Review Plan and Regulatory Guide 1.206. Secondly, the draft ISG references seven documents, but it says nothing about how the information in six of those documents is to be used. Some of the referenced documents contain draft criteria and preliminary assessments. One of the referenced documents has not been provided to the NRC on the docket and does not appear to be available in ADAMS. Thus, it is not at all clear how the information in References 1 through 6 is to be used by either the NRC staff or the Design Certification and COL applicants. References 1 through 6 should be deleted from ISG-19.

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

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Mr. Michael T. Lesar
December 14, 2009
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If you have any questions about the industry comments, please contact me or Kimberly Keithline
(202-739-8121; kak@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "RJB", is written over the typed name.

Russell J. Bell

c: Mr. William Burton, U.S. Nuclear Regulatory Commission
NRC Document Control Desk