

February 1, 2010

Dr. Said Abdel-Khalik, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
LETTER DATED DECEMBER 10, 2009, ON DRAFT FINAL REVISION 1 OF
REGULATORY GUIDE 1.151, "INSTRUMENT SENSING LINES"

Dear Dr. Abdel-Khalik:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to the December 10, 2009, letter from ACRS Chairman Mario Bonaca to R.W. Borchardt regarding recommendations of the Advisory Committee on Reactor Safeguards (ACRS) on the Draft Final Revision 1 of Regulatory Guide (RG) 1.151, "Instrument Sensing Lines." The Office of Nuclear Regulatory Research (RES) staff and I agree with the recommendations in the letter as discussed below.

ACRS Recommendation 1

Regulatory Guide 1.151 Revision 1 should not be issued until the staff resolves the recommendations 2 and 3.

NRC Response

The NRC staff agrees.

ACRS Recommendation 2

The scope of Draft Final Revision 1 to RG 1.151 should be reviewed to determine whether it should be revised to include non-safety-related systems categorized under the provisions of Regulatory Treatment of Non-Safety Systems (RTNSS).

NRC Response

The RES staff has reviewed the scope of the Draft Final Revision 1 of RG 1.151 and concluded that non-safety-related systems categorized under the provisions of RTNSS should not explicitly be listed in the scope of the guide. In SECY-94-084, "Policy and Technical Issues Associated with the Regulatory Treatment of Non-Safety Systems in Passive Plant Designs," it states "If active systems are relied on to meet the reliability/availability missions, the designer will impose design requirements commensurate with risk significance on those elements involved." Therefore, RTNSS allows the designer to make choices based on risk significance. While the RG does not explicitly identify RTNSS, nothing precludes an applicant from using the RG for RTNSS.

ACRS Recommendation 3

The staff should review existing requirements to determine whether the potential for flashing needs to be included in the RG as a mechanism affecting instrument accuracy.

NRC Response

The staff agrees. The Draft Final Revision 1 will be revised to address the potential inaccuracies of the reactor vessel level measurements due to the flashing within the vessel reference legs.

We appreciate the comments and recommendations provided by the ACRS and look forward to continuing to work with the Committee as the staff evaluates future updates to RG 1.151.

Sincerely,

/RA/

Brian W. Sheron, Director
Office of Nuclear Regulatory Research

cc: Chairman Jaczko
Commissioner Klein
Commissioner Svinicki
SECY
EDO

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We appreciate the comments and recommendations provided by the ACRS and look forward to continuing to work with the Committee as the staff evaluates future updates to RG 1.151.

Sincerely,

/RA/

Brian W. Sheron, Director
Office of Nuclear Regulatory Research

cc: Chairman Jaczko
Commissioner Klein
Commissioner Svinicki
SECY
EDO

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