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**Subject:** Response to Request for Comments Concerning Draft Regulatory Guide DG-1199, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors" (Federal Register Notice 74FR52822, dated October 14, 2009)

Exelon Generation Company, LLC (Exelon) is submitting this letter in response to a request from the Nuclear Regulatory Commission (NRC) for comments concerning Draft Regulatory Guide DG-1199, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors." DG-1199 is proposed Revision 1 of Regulatory Guide 1.183 (same title), dated July 2000.

DG-1199 describes a method that the staff of the NRC considers acceptable in complying with alternative source term (AST) regulations for design basis accident dose consequence analysis. This draft RG establishes the AST based on NUREG-1465, "Accident Source Terms for Light-Water Nuclear Power Plants," and identifies significant attributes of other accident source terms that may be acceptable. DG-1199 also identifies acceptable radiological analysis assumptions for use in conjunction with the AST.

Exelon appreciates the opportunity to comment on DG-1199 and offers the following comments for consideration by the NRC.

### General Comments

Exelon notes that substantive changes are being proposed to the modeling related to Main Steam Isolation Valve (MSIV) leakage. Leakage through the steam line pathway currently represents a significant fraction of the postulated Loss of Coolant Accident (LOCA) doses in the existing Design Basis Accident (DBA) analyses for Boiling Water Reactor (BWR) plants, including those plants that credit the alternate leakage pathway via the condenser. The proposed changes discussed in DG-1199 would have the effect of increasing the source term concentration entering the steam lines by up to 20 times that of the Regulatory Guide 1.183 methodology and assumptions, which will significantly impact the LOCA dose analysis.

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Add = B. Carpenter (rec 1)  
M. Blumberg (wmb 1)

The increase in postulated doses resulting from the proposed changes may cause these BWR plants to incur significant additional costs to maintain compliance with 10 CFR 50.67, "*Accident source term*," requirements in conjunction with future licensing actions. Because of these significant impacts, Exelon believes that a thorough review of the basis behind DG-1199 is warranted.

Since all of the technical basis documentation that DG-1199 relies upon has not yet been made available for review, Exelon considers the comments provided at this time to be incomplete. Once all of the technical information becomes publicly available for review, Exelon plans to provide additional comments as reviews of these documents are performed.

In addition, Exelon fully supports the comments submitted by the Nuclear Energy Institute (NEI) and the Boiling Water Reactor Owners Group (BWROG) on behalf of the industry related to DG-1199. Exelon provided specific and detailed comments to NEI and the BWROG for inclusion in the industry's response.

If you have any questions or require additional information, please do not hesitate to contact Mr. Richard Gropp at 610-765-5557.

Respectfully,



David P. Helker  
Manager - Licensing