

Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard, 2SE, Glen Allen, VA 23060



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Rules, Announcements, and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

GL 11-025

COMMENTS ON DRAFT REGULATORY GUIDE DG-1217,
"PROTECTION AGAINST TURBINE MISSILES"

Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to comment on Draft Regulatory Guide DG-1217, "Protection Against Turbine Missiles."

Dominion has reviewed the Draft Regulatory Guide and offers the following comment for consideration:

1. Regulatory Position 3 (on page 8): Why is it rigidly required that concrete barriers be designed to prevent back scabbing from turbine missiles? If it can be shown that the back scabbed concrete would not impair an SSC from performing its intended function, why shouldn't the requirement be based on functional sufficiency? The NRC should consider adding functional-based flexibility into this position of the proposed draft Regulatory Guide and permit back scabbing if it can be demonstrated that the associated SSC can continue to perform its intended function.

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

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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.

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