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# PUBLIC SUBMISSION

**Docket:** NRC-2012-0152  
Draft Regulatory Guide; Issuance, Availability

**Comment On:** NRC-2012-0152-0001  
Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants

**Document:** NRC-2012-0152-DRAFT-0002  
Comment on FR Doc # 2012-15960

## Submitter Information

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*6/29/2012  
77 FR 38857  
①*

## General Comment

See attached file(s)

## Attachments

2012-08-21 GEH Comments on DG-1280

*SONSI Review Complete  
Newplate = ADM-013*

*FRIDS = ADM-03  
Add = M. Poyssie (mubi)  
m. Crab (mjc)*



**HITACHI**

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MFN 12-094

August 21, 2012

Cindy Bladey, Chief  
Rules, Announcements, and Directives Branch  
Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

*Via Federal Rulemaking Website*

Subject: Comments: NRC-2012-0152, Draft Regulatory Guide 1280, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants," 77 Fed. Reg. 38857 (June 29, 2012)

Dear Ms. Bladey,

GE Hitachi Nuclear Energy ("GEH") provides comments on the subject request for comment. As explained in the Federal Register Notice, the draft guide describes a method for design, inspection, and testing of normal atmosphere cleanup systems for controlling releases of airborne radioactive materials to the environment during normal operations, including anticipated operational occurrences for light-water reactors. Specific comments are provided in Enclosure 1.

Please contact me if you have any questions regarding the GEH comments.

Sincerely,

Patricia L. Campbell

Commitments: None.

Enclosure: 1. Comments on DG-1280.

CC: NRC-2012-0152

GE Hitachi Nuclear Energy ("GEH") provides the following comments related to NRC Draft Regulatory Guide DG-1280 (*Proposed Revision 3 of Regulatory Guide 1.140*), "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants," 77 Fed. Reg. 38857 (June 29, 2012).

Section of DG-1280	Comment	Suggested Change
Page 2, 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> sentence ... "as reasonably demonstrated technology.."	The referenced sentence does not make sense.	Suggest retaining original sentence. "Appendix I also requires that additional radwaste equipment be provided if the equipment <u>has reasonably demonstrated technology...</u> "
Page 2, 1 <sup>st</sup> paragraph, last sentence.	Extraneous words appear to be unnecessary.	Suggest revise wording as below: "The requirements of this paragraph D need not be complied with by persons who have filed applications for construction permits which were docketed on or after January 2, 1971, and prior to June 4, 1976, if the radwaste systems and equipment described in the preliminary or final safety analysis report and amendments <del>there to</del> satisfy the Guides on Design Objectives for Light-Water-Cooled Nuclear Power Reactors proposed in the Concluding Statement of Position of the Regulatory Staff in Docket-RM-50-2 dated February 20, 1974, pp. 25-30, reproduced in the Annex to this Appendix I."
Page 2, 5 <sup>th</sup> paragraph, 5 <sup>th</sup> sentence., and	IAEA Safety Standard SG NS-R-1, "Safety of Nuclear Power Plants: Design," has been superseded by	Change the sentence and Reference 4 to SSR-2/1.  See the links below for verification:

Section of DG-1280	Comment	Suggested Change
Reference 4.	IAEA Safety Standard SSR-2/1, "Safety of Nuclear Power Plants: Design," January 2012.	<a href="http://www-pub.iaea.org/MTCD/publications/PDF/Pub1099_scr.pdf">http://www-pub.iaea.org/MTCD/publications/PDF/Pub1099_scr.pdf</a>  <a href="http://www-pub.iaea.org/MTCD/publications/PDF/Pub1534_web.pdf">http://www-pub.iaea.org/MTCD/publications/PDF/Pub1534_web.pdf</a>
Page 3, 6 <sup>th</sup> paragraph, last sentence.	<p>This paragraph discusses that cleanup systems are also used to treat process streams from power cycle waste offgas Systems. It states:</p> <p>"The ASME Committee on Nuclear Air and Gas Treatment (CONAGT) has indicated their intention for future editions of the ASME AG-1 code to detail requirements for power cycle waste offgas systems. Staff positions now include power cycle waste offgas systems in anticipation that future revisions of this guide will address the ASME AG-1 code."</p> <p>However, AG-1 does not currently include offgas systems within its scope. Regulatory guidance should not be based on actions that have not yet been completed.</p>	The final Regulatory Guide should be revised to remove staff positions based on expected future action of a Code Committee until such actions are completed. Sections that should be deleted or modified are: C.2.d, C.3.g, C.4.n, C.5.d, C.6.h, C.7.e, and Table 1 Notes (Note (5)).
Page 10, 7.c, 1 <sup>st</sup> sentence.	There appears to be a significant change in the sampling and analysis intervals for	The NRC should consider whether such a significant increase in laboratory testing is warranted for those

Section of DG-1280	Comment	Suggested Change
	<p>laboratory testing of activated carbon adsorber section samples for systems that operate continuously. In pertinent part, RG 1.140, Rev. 2 (current guidance), indicates that sampling and analysis should be performed at intervals of approximately 24 months. DG-1280 refers to frequency intervals in Sections 7 and 5.9 of ASME N511-2007 to replace the current guidance.</p> <p>ASME N511-2007, Section 5.9, evokes a 720-run-hour interval requirement for laboratory testing of adsorbent, compared to the current guidance of approximately every 24 months. Even with redundant filter trains, this is an increase of approximately 6 times the test frequency as with the current guidance in RG 1.140, Rev. 2. While this frequency may arguably be reasonable for systems/train applications that do not operator continuously, it does not appear reasonable for on-line filter trains that operate continuously.</p>	<p>systems that operate continuously. The NRC should consider retaining a 24-month interval for systems that operate continuously.</p>