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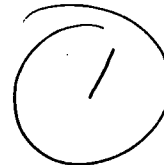
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5/1/2013
78 FR 25488



June 28, 2013

Ms. Cindy K. Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Regulatory Guide DG-1235, "Qualification Tests for Safety-Related Actuators in Nuclear Power Plants"; Docket ID NRC-2013-0079

Project Number: 689

Dear Ms. Bladey:

In a May 1, 2013 Federal Register Notice (78 FR 25488), the U.S. Nuclear Regulatory Commission (NRC) requested public comments on Draft Regulatory Guide DG-1235, "Qualification Tests for Safety-Related Actuators in Nuclear Power Plants." This draft regulatory guide describes a method that the NRC staff considers acceptable for use in complying with the Commission's regulations for the environmental qualification of safety-related power-operated valve actuators in nuclear power plants.

This proposed revision of Regulatory Guide 1.73 endorses the Institute of Electrical and Electronics Engineers (IEEE) Standard 382-2006, "IEEE Standard for Qualification of Safety-Related Actuators for Nuclear Power Generating Stations". DG-1235 also provides an adequate basis for complying with the qualification testing requirements of Criterion III, "Design Control" of Appendix B to 10 CFR Part 50 to verify adequacy of design for service under Design Basis Event (DBE) conditions. Nuclear Energy Institute (NEI)¹ appreciates the opportunity to submit the attached comments, on behalf of the industry, for NRC consideration.

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

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Industry's comments include suggested changes to statements listed in section C of DG-1235 regarding modifications to IEEE Standard 382-2006. These changes would clarify that, since Regulatory Guides do not constitute requirements, use of this proposed revision by licensees is voluntary.

If you have any questions or require additional information, please contact me at 202-739-8106, mar@nei.org.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Richter". The signature is written in a cursive style with a large initial "M".

Mark A. Richter, Ph.D.

Attachment

c: Mr. Darrell D. Murdock, RES/DE/ICEEB, NRC

Comments and Proposed Changes to DG-1235

Submitted by NEI – June 28, 2013

| Cmt # | Page # | Line # or Section Number | Comment | Proposed Change |
|--------------|---------------|---------------------------------|---|---|
| 1 | 5 | C.6 | <p>Modification 6 states, "The documentation requirements to determine the level of qualification of actuators intended for generic or specific applications should conform to Section 8, 'Documentation' of IEEE Std. 382-2006."</p> <p>Item 6 is unnecessary since the staff is endorsing the standard. Only exceptions, clarifications and modifications should be included.</p> | Delete C.6 from DG-1235. |
| 2 | 6 | C.10 | <p>Modification states "The equipment needs to be qualified for the duration of its operational performance requirement for each applicable DBE condition, including any required post DBE operability period."</p> <p>The phrase "including any required post DBE operability period" imposes actions that are not required.</p> | The phrase "including any required post DBE operability period" needs to be removed. It is not necessary to qualify beyond DBE. |