

Response to Public Comments on Draft Regulatory Guide (DG)-1235, “Qualification Tests for Safety-Related Actuators in Nuclear Power Plants” Proposed Revision 1 of Regulatory Guide 1.73

A *Federal Register Notice* was published May 1, 2013 (78 FR 24488) announcing the availability of draft regulatory guide (DG)-1235, “Qualification Tests for Safety-Related Actuators in Nuclear Power Plants” for public comment. DG-1235 is proposed revision 1 of regulatory guide (RG) 1.73, “Qualification Tests of Electric Valve Operators Installed Inside the Containment of Nuclear Power Plants.” The comment period ended June 28, 2013. The following table contains the public comments received and the NRC staff responses.

Comments were received from: Nuclear Energy Institute (NEI) International Atomic Energy Agency (IAEA)

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Comment	Location	Comment	NRC Staff Response
NEI #1 M. Richter	Pg. 5, Section C.6	Modification 6 states, "The documentation requirements to determine the level of qualifications of actuators intended for generic or specific applications should conform to Section 8, 'Documentation' of IEEE Std. 382-2006." Item 6 is unnecessary since the staff is endorsing the standard. Only exceptions, clarifications and modifications should be included. Delete C.6 from DG-1235.	Thank you for your comment. The staff agrees and item 6 has been deleted from the final document.
NEI #2 M. Richter	Pg. 6, Section C.10	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."	Thank you for your comment. No change has been made in document. The staff believes that the phrase in item C-10 “including

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		<p>The phrase "including any required post DBE operability period" imposes actions that are not required.</p> <p>The phrase "including any required post DBE operability period." needs to be removed. It is not necessary to qualify beyond DBE.</p>	<p>any required post DBE operability period" specifically refers to already existing post design basis event (DBE) period of operability requirements for the actuator. The staff does not believe that the phrase "including any required post DBE operability period" establishes new requirements.</p>
IAEA #1 T. Koshy	Page 3 - Background 2 nd paragraph	<p>Insert "anticipated variations in" in the phrase "...fluid jet or spray environment, seismic and non-seismic vibration environment, radiation environment, anticipated variations in input power source (electrical and mechanical), and..."</p>	<p>Thank you for your comment. The proposed phrase has been added to the final document.</p>
IAEA #2 T. Koshy	Page 5 (C-5)	<p>Delete "operating condition" from the phrase "... unless the anticipated actual service operating sequence for the actuator is expected to create a more severe operating-condition than described in Section 6.3.2,..."</p>	<p>Thank you for your comment. The staff has replaced "...create a more severe operating condition than..." with "...create a more severe impact than described..."</p>