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Docket: NRC-2015-0161

Comprehensive Vibration Assessment Program for Reactor Internals During Preoperational and Startup Testing

Comment On: NRC-2015-0161-0001

Comprehensive Vibration Assessment Program for Reactor Internals During Preoperational and Startup Testing

Document: NRC-2015-0161-DRAFT-0003

Comment on FR Doc # 2015-16284

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General Comment

See attached file(s)

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Attachments

GE Hitachi Comments on DG-1323

60FR 38239

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SUNSI Review Complete

Template = ADM - 013

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Add= T. Scarborough (TGS)

GE Hitachi Comments on DG-1323

Affected Section	Comment/Basis	Recommendation
<p>1. Section B Background Page 3 and Section C.2 (c) Page 12</p>	<p>The draft guidance states "...studies of past failures in nuclear power plants have determined that the steam dryer in a BWR plant experienced fatigue failure caused by vibration transmission from the reactor pumps at the VPF."</p> <p>This is misleading because the studies cited did not state that the cause of the dryer fatigue failure was due to the reactor pump VPF vibrations. The structural resonance shown in the RAI response was measured on the repaired panel that operated successfully for more than 20 years. The reactor pump VPF vibrations most likely contributed to the fatigue failure; however, it was not conclusively determined that the VPF vibrations were the sole cause of the failure. Fatigue failures have occurred at the same dryer location in other BWRs with both variable speed reactor recirculation pumps and constant speed reactor recirculation pumps.</p>	<p>Revise the statement to read "...studies of past failures in nuclear power plants have determined that vibration transmission from the reactor pumps at the VPF may have contributed to the fatigue failure of the steam dryer in a BWR plant."</p>
<p>2. Section C2.2.2 (f) Page 30</p>	<p>The draft guidance states "All instrumentation wiring needs to be properly shielded and, if possible, routed through reactor penetrations that do not include electrical supply lines."</p> <p>This is incorrect. "Reactor penetrations" should be changed to "containment penetrations."</p>	<p>Revise the statement to read "All instrumentation wiring needs to be properly shielded and, if possible, routed through containment penetrations that do not include electrical supply lines."</p>
<p>3. Background</p>	<p>The draft guidance contains the sentence:</p> <p>This regulatory guide discusses activities separate from inservice inspection and inservice testing programs established in compliance with 10 CFR 50.55a, "Codes and Standards."</p> <p>What the purpose is of this statement?</p>	<p>Please Clarify.</p>