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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

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Cindy Bladey
Office of Administration
Mail Stop: OWFN-12 H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001.

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Subject: Tennessee Valley Authority (TVA) Comments on Draft Regulatory Guide DG-1292, Dedication of Commercial-Grade Items for Use in Nuclear Power Plants (Docket ID NRC-2016-0133)

- References:
1. 81 FR 44670 (July 8, 2016), Dedication of Commercial-Grade Items for Use in Nuclear Power Plants; Draft Regulatory Guide for Comment
 2. Letter dated August 12, 2016, from Wiegand (Electric Power Research Institute) to Bladey (NRC), 'Docket ID NRC-2016-0133, Comments to Draft Regulatory Guide DG-1292, "Dedication of Commercial-Grade Items for Use in Nuclear Power Plants"'
 3. Letter dated August 30, 2016, from Earls (Nuclear Energy Institute) to Bladey (NRC), "Industry Comments on Draft Regulatory Guide DG-1292 *Dedication of Commercial-Grade Items for Use in Nuclear Power Plants* [Docket ID NRC-2016-0133]"

In the referenced Federal Register, NRC requested comments on the subject draft regulatory guide (DG), DG-1292, "Dedication of Commercial-Grade Items for Use in Nuclear Power Plants."

In references 2 and 3, the Electric Power Research Institute (EPRI) and the Nuclear Energy Institute (NEI) submitted comments on the Draft Regulatory Guide. TVA hereby expresses our agreement and support for the comments submitted by EPRI and NEI in those letters. Additionally, TVA wishes to emphasize, consistent with the EPRI and NEI comments, that DG-1292 could be perceived as contradicting the regulatory guide (RG) for Seismic Qualification, RG 1.100 when the DG states on page 7, Section C, Item 1:

"Revision 1 of EPRI NP-5652 and TR-102260, in Section I.3 refers to two EPRI guidance documents, NP-7874 "Seismic Technical Evaluation of Replacement Items for Nuclear Power Plants (STERI)" (Ref. 14), and TR 105849, "Plant Support Engineering: Generic Seismic Technical Evaluations of Replacement Items for Nuclear Power Plants," Revision 1 (Ref. 15). The NRC does not find these two EPRI documents to be acceptable for use, and in general does not find the use of generic testing data bases acceptable as a means for maintaining or providing seismic qualification of seismically sensitive replacement components."

SUNSI Review Complete

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In fact, qualification involving the use of generic testing data through similarity is an accepted method of qualification addressed in Institute of Electrical and Electronics Engineers (IEEE) Standard 344 and NRC RG 1.100. Elimination of EPRI guidance documents NP-7484 and TR 105849 could significantly impact commercial grade dedication programs, and TVA recommends that this text be removed from DG-1292 before it is issued as a Regulatory Guide.

If this text is not removed as requested in EPRI comments 4, 5, and 6, TVA requests that the language be modified as requested by NEI comment 10, stating that "these documents have not been reviewed and approved as an acceptable approach for meeting an NRC requirement." (Note that the reference to NP-7874 should also be changed to NP-7484.)

Please contact Chris Riedl at 423-751-3835 if you have any questions concerning our comments or endorsement of the EPRI or NEI comments.

There are no regulatory commitments contained in this letter.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

cc:

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
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