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**Docket:** NRC-2017-0040  
Initiatives to Address Gas Accumulation Following Generic Letter 2008-01

**Comment On:** NRC-2017-0040-0001  
Initiatives to Address Gas Accumulation Following Generic Letter 2008-01; Draft Regulatory Issue Summary for Comment

**Document:** NRC-2017-0040-DRAFT-0002  
Comment on FR Doc # 2017-02866

*2/13/2017*  
*82FR 10504*

## Submitter Information

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**Organization:** Southern Nuclear

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## General Comment

See attached file(s)

## Attachments

NL-17-0396

**SUNSI Review Complete**  
Template = ADM - 013  
E-RIDS= ADM-03  
Add= *D. Wood-yatt (dxw)*  
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March 14, 2017

NL-17-0396

Cindy Bladey  
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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Comments on Draft Regulatory Issue Summary 2017-##,  
"Status of Regulatory Actions Taken to Address Gas Accumulation in Emergency Core Cooling,  
Decay Heat Removal, and Containment Spray Systems" [Docket ID NRC-2017-0040]

Dear Ms. Bladey:

Southern Nuclear Operating Company (SNC) hereby submits comments for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, SNC is providing comments on Draft Regulatory Issue Summary (RIS) 2017-##, "Status of Regulatory Actions Taken to Address Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as noticed in the Federal Register (82 FR 10504; Docket ID NRC-2017-0040).

SNC has reviewed the draft RIS and has the following comments:

1. This RIS is unnecessary since the NRC has already adequately conveyed this information through earlier publications and approvals.
2. On page 3 of the draft RIS, the third sentence of the 2<sup>nd</sup> full paragraph refers to "NEI 09-10 and TSTF-523" as "an acceptable means of managing gas accumulation." As written, the use of the conjunction "and" between "NEI 09-10 and TSTF-523" with the article "an" in the same sentence implies that the two methodologies are a single approach. This statement contradicts the last sentence of the previous paragraph where the same methodologies are identified as two separate approaches.

SNC recommends removing the article "an" from the sentence.

3. On page 3 of the draft RIS, the last sentence of the 2<sup>nd</sup> full paragraph refers to "licensees who choose not to implement NEI 09-10 and TSTF-523." As written, this sentence implies that licensees not utilizing an alternative method of ensuring system operability would be expected to implement both NEI 09-10 and TSTF-523.  
SNC recommends changing the conjunction from "and" to "or" in this sentence.
4. On page 3 of the draft RIS, item (ii) of the 3<sup>rd</sup> full paragraph refers to "NEI 09-10 and TSTF-523" as "an acceptable means of managing gas accumulation." As written, the use of the conjunction "and" between "NEI 09-10 and TSTF-523" with the article "an" in the same sentence again implies that the two methodologies are a single approach. This statement

contradicts the last sentence of the first full paragraph on the same page where these methodologies were identified as two separate approaches.

SNC recommends removing the article “an” from the sentence.

5. On page 3 of the draft RIS, item (iii) of the 3<sup>rd</sup> full paragraph refers to “licensees who do not to follow NEI 09-10 and TSTF-523.” As written, this sentence again implies that licensees not utilizing an alternative method of ensuring system operability would be expected to implement both NEI 09-10 and TSTF-523.

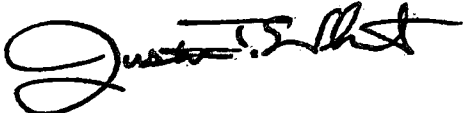
SNC recommends changing the conjunction from “and” to “or” in this sentence.

**Rationale:** Considering the referenced documents and timeline of events provided in the Background Information section, the NRC has already adequately conveyed the information in this RIS through earlier publications and approvals. In contrast with previous agreements with the industry, the current wording identified in comments 2 through 5 above may be interpreted as a new regulatory requirement for licensees to implement both methodologies, which would require a backfit analysis. In this situation, SNC does not consider the use of a RIS as the appropriate mechanism or process for establishing new requirements.

Furthermore, the inclusion of statements binding the use of both TSTF-523 Revision 2 and NEI 09-10 Revision 1a-A would contradict the relationship between the two methodologies as previously defined in the implementation guidance document (TSTF-IG-14-01, Revision 0) to TSTF-523 Revision 2.

This letter contains no NRC commitments. If you have any questions, please contact me at 205.992.5998.

Respectfully submitted,



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JTW/KMO/lc

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