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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-0003

Comment on FR Doc # 2017-02866

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3/13/2017
82 FR 10504

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General Comment

Tennessee Valley Authority 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)

See attached file(s)

Attachments

CNL-17-042 Final TVA Comments Draft RIS 2017-xx Gas Accumulation

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= D. Woolyatt(dx25)
A. Larmoe (ad92)



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

CNL-17-042

March 15, 2017

82 FR 10504

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

Subject: Tennessee Valley Authority (TVA) 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)

Reference: 82 FR 10504 (February 13, 2017), Initiatives To Address Gas Accumulation Following Generic Letter 2008-01; Draft regulatory issue summary; request for comment

In the referenced *Federal Register* notice, NRC requested comments on the subject 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."

Following are TVA's comments on the draft RIS:

1. This RIS is unnecessary as it is redundant with issues already addressed through GL 2008-01 closure letters, 79 FR 2700, and RIS 2013-09.
2. The draft RIS Background Information, on page 2 of 6, includes the statement that the "... staff determined that the plant-specific TS and STS must be improved, consistent with Administrative Letter 98-10 ..." The source of this information is not identified, and it appears to document a requirement that was not specified in previous GL 2008-01 documentation.
3. The draft RIS appears to bring into question closure of GL 2008-01 when it indicates in the first full paragraph on page 3 of 6 of the draft RIS that NEI 09-10 and TSTF-523 are acceptable approaches to demonstrate operability, and in the second and third full paragraphs on that page appears to require both NEI 09-10 and TSTF-523 to sufficiently demonstrate continued operability. The RIS should clarify whether or when both are required. The GL 2008-01 gas accumulation issues were closed for TVA plants before issuance of these industry initiatives and without reliance on those initiatives. For those plants, the draft RIS appears to impose additional requirements.

4. The Backfitting and Issue Finality Discussion on page 3 of 6 appears to inaccurately address the potential impact to licensees of this RIS when it states it "...would not require any action or written response on the part of any addressee." The draft RIS proposal for the NRC to "...address backfitting and/or issue finality, as applicable, at the time that it takes such [additional regulatory] action" ... seems inappropriate. Backfitting and issue finality criteria evaluations should not be deferred until a licensee objects when additional regulatory action is being taken against that licensee.
5. Based on the comments above, this draft RIS could constitute a new requirement. As such, this draft RIS may be an example of the less obvious "implicit backfits" that may be "creeping into the process", as noted in the February 28, 2017 CRGR Meeting on Tasking Memo Response. The draft RIS should be evaluated with consideration of the results of that meeting, and that evaluation should be discussed in a public meeting with external stakeholders.

Please contact Chris Riedl at 423-751-3835 if you have any questions concerning TVA's comments.

There are no regulatory commitments contained in this letter.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

cc:

<http://www.regulations.gov/>