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Docket: NRC-2016-0233

Pressurized Water Reactor Control Rod Ejection and Boiling Water Reactor Control Rod Drop Accidents

Comment On: NRC-2016-0233-0003

Pressurized Water Reactor Control Rod Ejection and Boiling Water Reactor Control Rod Drop Accidents;
Extension of Comment Period

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Comment on FR Doc # 2017-02073

Submitter Information

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General Comment

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Virgil C. Summer Nuclear Station Unit 1 is providing the following comments concerning its review of Draft Regulatory Guide (DG) 1327.

Section 2.1.3: Please clarify what kind of manufacturing tolerances are referred to here. Does this require a statistical analysis with 95/95 uncertainty?

Section 2.2.3: Given that a large majority of the time each reactor spends at power is near 100%, can low power conditions be excluded from the analysis? Many transient analyses are performed at zero power and full power based on probability. It would be very time-consuming to determine if intermediate power levels are more limiting at each burnup interval. It would seem that even for a load-following plant, examinations of 0, 80%, 90%, and 100% would be sufficient to cover 99% of the probability distribution.

Section 2.5.1: For control rod ejection (CRE), since the reactivity-initiated accident (RIA) transient is caused by the pressure boundary breach, the analysis should be able to credit the pressure boundary breach in the peak RCS pressure analysis.

Section 4: This section should be removed from DG-1327. Information related to the performance of radiological consequence analyses should remain in RG 1.183.

Section 6: The reactor coolant peak pressure acceptance criterion is already defined in a plant's Final Safety Analysis Report and may differ from the limit defined in DG-1327. The Regulatory Guide should not override existing licensed limits.

SUNSI Review Complete
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