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Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems

Comment On: NRC-2018-0076-0001

Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems

Document: NRC-2018-0076-DRAFT-0004

Comment on FR Doc # 2018-08493

Submitter Information

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General Comment

See attached letter.

Attachments

LTR-NRC-18-44

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ADD= Jazel Parks, Michael
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LTR-NRC-18-44

June 22, 2018

Subject: Transmittal of Westinghouse Electric Company Comments on DG-1333 [Docket ID NRC-2018-0076]

Westinghouse Electric Company (Westinghouse) appreciates the opportunity to comment on Draft Regulatory Guide DG-1333, "Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems." The enclosure to this letter contains a table of several editorial and technical comments. Westinghouse appreciates the NRC staff's consideration of the comments in the enclosure.

If you need additional information, please contact Amanda Spalding at 860-731-6734 or spaldiaj@westinghouse.com.

A handwritten signature in black ink, appearing to read "Edmond Mercier", with a long horizontal flourish extending to the right.

Edmond Mercier, Manager
Fuels Licensing and Regulatory Support

Enclosure 1: Westinghouse Comments on DG-1333

Enclosure 1
Westinghouse Comments on DG-1333

Comment Number	Location in DG-1333	Comment Type Editorial(E)/ Technical(T)	Comment
1	Page 9, Table 1, Regulatory Position 1	E	Add "N/A" under "Standards Endorsed" column.
2	Page 10, 1 st paragraph	E	The units for the values in parentheses should be "dB μ V/m" instead of "dB/m" in the following text: "... (140 dB/m), the size of the exclusion zones..." and "... from the portable EMI/RFI emitters are limited to 4 V/m (132 dB /m)..."
3	Page 13, Section 3.4, 1 st paragraph	E	Remove the word "emissions" after "2MHz to 10 GHz."
4	Page 21, Section 4.2, 1 st paragraph	E	Remove the "f" in front of "methods in f IEC 61000-4."
5	Page 21, Table 13	E	Table 13 should reference MIL-STD-461G instead of MIL-STD-461E.
6	Page 22, Table 17, 61000-4-12	E	The IEC 61000-4-12 Level 3 test voltage is 2kV for line to ground, not 4 kV as documented in the table. The Level 4 test voltage is 4kV.
7	Page 22, Table 18	E	Table 18 should reference MIL-STD-461G instead of MIL-STD-461E.
8	Page 22, Tables 18 and 19	T	Tables 18 and 19 identify different upper frequency limits for radiated susceptibility, electric field tests (i.e., 10 GHz vs. 6 GHz). Please add clarification, noting that testing above 6 GHz is not required if the IEC 61000-4-3 test method is used.
9	Page 27, Section 5.1, 1 st paragraph	T	The beginning of the section reads: "The Ring Wave simulates oscillatory surges of relatively high frequency on the ac power leads..." Is the ring wave test not applicable to DC power lines?
10	Page 28, Section 5.2, 1 st paragraph	T	The beginning of the third line of this paragraph reads: "...switching on the ac power leads of equipment and subsystems." Is the combination wave test not applicable to DC power lines?
11	Page 29, Section 5.3, 1 st paragraph	T	Is the Electrically Fast Transients test not applicable to DC power lines?