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Dispositioning of Technical Specifications that are Insufficient to Ensure Plant Safety

Comment On: NRC-2018-0137-0001
Dispositioning of Technical Specifications That Are Insufficient To Ensure Plant Safety

Document: NRC-2018-0137-DRAFT-0001
Comment on FR Doc # 2018-14379

Submitter Information

Name: Tim Riti
Organization: Nuclear Energy Institute

General Comment

See attached.

Attachments

08-01-18_NRC_NEI Draft Industry Comments to Draft Regulatory Guide DG-13.._

SUNSI Review Complete
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ADD= Blake Purnell
Stephen Burton

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NUCLEAR ENERGY INSTITUTE

August 1, 2018

Ms. May Ma
Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments to Draft Regulatory Guide DG-1351, "Dispositioning of Technical Specifications That Are Insufficient To Ensure Plant Safety" (Federal Register Vol. 83, 31429, dated July 5, 2018 - Docket ID NRC-2018-0137)

Project Number: 689

Dear Ms. Ma:

On behalf of its members, the Nuclear Energy Institute (NEI)[1] appreciates the opportunity to provide comments on the proposed Draft Regulatory Guide (DG-1351) which proposes new guidance on methods and procedures that are acceptable to the NRC staff for dispositioning of technical specifications (TS) that are insufficient to ensure power plant safety.

The draft regulatory guide endorses NEI 15-03, Revision 2, "Licensing Actions to Address Nonconservative Technical Specifications," with exceptions.

In 2013, the NRC requested that the industry develop guidance on licensee actions to address nonconservative Technical Specifications (NCTS) to replace NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications that are Insufficient to Ensure Plant Safety." The industry guidance would be in lieu of new NRC guidance. The industry and NRC held two meetings in 2014 and NEI 15-03[2] was submitted

[1] The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified policy on behalf of its members on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

[2] NEI 15-03, Rev. 0, "Licensee Actions to Address Nonconservative Technical Specifications", April 2015, transmitted by NEI's Bruce S. Montgomery to NRC's Robert B. Elliott by letter dated May 11, 2015.

in May 2015. In July 2016, a follow up meeting occurred to discuss NRC comments on this document. The industry revised the document to address the staff concerns and submitted Revision 1 in October 2016. The NRC staff requested another meeting in August 2017 to discuss additional comments. The industry revised NEI 15-03 to address the NRC staff concerns and submitted Revision 2 in October 2017. Industry representatives believed the staff's concerns were addressed in Revision 2 to NEI 15-03. The exceptions that the staff describes in DG-1351 for treatment of a lack of technical specifications and expectations for final corrective action timeliness are significant and could be interpreted as imposing new requirements on the industry.

We request that the comment period be extended from September 4th by an additional 30 days. This should provide time for NRC and industry to meet and, hopefully, resolve NEI's concerns.

Please contact me at txr@nei.org if you require information or clarification concerning these comments.

Sincerely,

Timothy Riti

c: Michele Evans NRC/NRR