

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD=Tom Boyce, Jazel
 Parks

As of: 3/13/19 3:17 PM Received: February 14, 2019 Status: Pending_Post Tracking No. 1k3-9893-9jkk Comments Due: April 09, 2019 Submission Type: Web

PUBLIC SUBMISSION

COMMENT (1)
 PUBLICATION DATE:
 2/8/2019
 CITATION 84 FR 2934

Docket: NRC-2019-0041
 Instrument Sensing Lines

Comment On: NRC-2019-0041-0001
 Instrument Sensing Lines

Document: NRC-2019-0041-DRAFT-0001
 Comment on FR Doc # 2019-01556

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General Comment

The proposed revision to RG 1.151 omitted 2 key criteria from the Regulatory Positions of the 2010 version of the RG 1.151.

IEEE Std 622-1987 regarding heat tracing.

ANSI/ISA-67.02.01-1999 regarding non-condensable gases.

While these documents are discussed to some limited degree in section B of the proposed revision, unless there is some other RG that you can point to within this RG that endorses those 2 Regulatory Positions, the references to those documents should not be deleted.

In addition, the discussion about Heat Tracing in Section B does not sufficiently address the need for heat trace to prevent the deposition of radionuclides of interest on the sampling line surfaces.

RG 4.16, ANSI N13.1 should be mentioned in the regulatory positions section. RG 4.16, ANSI N13.1 and 10 CFR 20 Subpart F Surveys and Monitoring should be discussed in Section B.

The regulatory Positions section should include references to GDC 60 and GDC 64.

RG 4.16 Monitoring and Reporting Radioactivity in Releases of Radioactive Materials in Liquid and Gaseous Effluents from Nuclear Fuel Processing and Fabrication Plants and Uranium Hexafluoride Production Plants, states The NRC recognizes the guidance developed in American National Standards Institute (ANSI)/Health Physics Society (HPS) N13.1-1999, Sampling and Monitoring Releases of Airborne Radioactive Substances from the Stacks and Ducts of Nuclear Facilities.

ANSI N13.1 states If the contaminants are in the form of condensible vapors or reactive gases, long transport

lines and large temperature changes in the sample or the transport line shall either be avoided or measures shall be taken to minimize potential loss of sample. Heat tracing of the transport line is readily accomplished, but conditioning of the sample may be necessary, such as a deliberate temperature change and purposeful dilution with a carrier gas.

Conformance with this guidance is necessary in order for licensees to demonstrate compliance with 10 CFR 20 Subpart F Surveys and Monitoring