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General Comment

Southern Nuclear Operating Company Comments on draft RG, DG-1352, "Instrument Sensing Lines."
Docket ID NRC-2019-0041

Attachments

NL-19-0373

Southern Nuclear

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NL-19-0373

Southern Nuclear Operating Company
Comments on draft RG, DG-1352, "Instrument Sensing Lines." Docket ID NRC-2019-0041

To Whom It May Concern:

The U. S. Nuclear Regulatory Commission (NRC) published draft regulatory guide, DG–1352, "Instrument Sensing Lines" (Docket ID NRC-2019-0041) for comment in the Federal Register (84 FR 2934) on February 8, 2019. DG–1352 describes an approach that is acceptable to the NRC staff to meet regulatory requirements for instrument sensing lines in nuclear power plants. The DG would endorse, with certain clarifications, standards that were updated and corrected subsequent to the last time the NRC endorsed them.

Southern Nuclear Operating Company (SNC) has reviewed the draft regulatory guide and is hereby providing comments, which have been consolidated and included in the enclosure to this letter.

This letter contains no NRC commitments. If you have any questions, please contact me at 205.992.5998.

Respectfully submitted,

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JTW/kmo/scm

Enclosure: SNC Comments on Docket ID NRC-2019-0041

cc: Southern Nuclear Operating Company
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Southern Nuclear Operating Company
Comments on draft RG, DG-1352, "Instrument Sensing Lines." Docket ID NRC-2019-0041

Enclosure

SNC Comments on Docket ID NRC-2019-0041

SNC Comments on Docket ID NRC-2019-0041

#	DG-1352 (Section, Page, Paragraph)	Comment	Proposed Resolution
1	Purpose Section, Page 1, 2nd Paragraph	Typically, ISA standards have an "S" at the beginning of the number to differentiate it as a standard. Thus, it is expected that the ANSI/ISA standard would be S67.02.01-2014 versus 67.02.01-2014.	SNC recommends verifying if the number for the endorsed ANSI/ISA standard is correct as currently written, or if the letter "S" should be included before 67.02.01-2014.
2	Applicable Regulations Section, Page 2, GDC 2 Reason for Revision Section, Page 5	GDC 2, "Design Basis for Protection Against Natural Phenomena" was not included in Revision 1 of RG 1.151. Because the "Reason for Revision" does not address the inclusion of GDC 2, is not clear from the current context as to why the staff chose to add it in this revision.	SNC recommends revising the "Reason for Revision" section to address the reason GDC 2 was included in proposed revision 2 of RG 1.151.
3	Applicable Regulations Section, Page 3, First Sub-bullet beginning with *10 CFR 50.55a(h)(2)*	In revision 1 of RG 1.151, a later version of IEEE Std. 279 (1971) is referenced. It is not clear why the staff chose to refer to an earlier version of IEEE Std. 279 (1968) instead of the later version that was previously referenced in revision 1 of RG 1.151.	SNC recommends revising the first sub-bullet on page 3 beginning with "10 CFR 50.55a(h)(2)", to reference IEEE Std. 279-1971 instead of IEEE Std. 279-1968.