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WORK NUMBER *DR - Missy Kottler*
EXPOSED RULE *1.35 - Reg Guide*

Secretary of the Commission
Att: Docketing and Service Section
US Nuclear Regulatory Commission
Washington, DC 20555

The following comments concerning Regulatory Guide 1.35, proposed Revision 3, "Inservice Inspection of UngROUTed Tendons in Prestressed Concrete Containment Structures", and proposed Regulatory Guide 1.35.1, "Determining Prestressing Forces for Inspection of Prestressed Concrete Containments", are presented for your consideration:

Regulatory Guide 1.35

- 1. Page 4, paragraph 2 - It is suggested that the 5% limit for discrepancies in tendon grease be deleted. Leaks are easily detected by periodic visual inspections or manifest themselves during refilling operations. Therefore, a careful measurement of the amounts of grease removed and injected is not necessary.

Regulatory Guide 1.35.1

- 1. Page 10, paragraph 4 and following - The magnitude of the variations used for shrinkage strain, creep strain and relaxation is not supported by any referenced data or calculations. Therefore, the variation percentages appear to be arbitrary. It is suggested that values for these variation percentages be chosen based on referencable analytical work, statistical data or industry experience.
- 2. Page 25, Section 1.2 - It appears to be unnecessary to single out a specific incident, plant or supplier as justification for the creation of this Regulatory Guide. If the referenced incident were the only difficulty to have been experienced, it would seem unlikely that the creation of a new guide would be warranted.

Please consider these comments in future actions concerning this guide.

David P. Hoffman

Acknowledged by card... *gc 10/22*

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