

BACKGROUND AND VALUE/IMPACT ASSESSMENT OF PROPOSED REVISION 2 TO  
REGULATORY GUIDE 1.39 (RS 607-5), "HOUSEKEEPING REQUIREMENTS FOR  
WATER-COOLED NUCLEAR POWER PLANTS"

Background

Regulatory Guide 1.39, "Housekeeping Requirements for Water-Cooled Nuclear Power Plants", is being revised to respond to public comments received on the guide. Copies of the comments and a discussion of these comments is attached.

Significant Change and its Value/Impact

Endorsement of Subdivision 3.2.3 of ANSI N45.2.3-1973

Public comments were received that expressed confusion over the position in Revision 1 of Regulatory Guide 1.39 that endorsed both the guidelines and the requirements in Subdivision 3.2.3, Fire Protection and Prevention, of ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants". One commenter questioned NRC's endorsement of Subdivision 3.2.3 because it lacked specificity and provided little useful guidance. Another commenter disagreed with NRC's endorsement of the guideline on fire watches because he was concerned that this position would require fire watches during and immediately following all welding operations. Also, it was identified that the reference to the National Fire Codes in Subdivision 3.2.3 was incorrect.

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We are in agreement with the comment that Subdivision 3.2.3 lacks specificity and recognize that other NRC publications present more detailed guidance on fire protection and prevention. Further, if the guideline on fire watches in Subdivision 3.2.3 were interpreted as requiring a fire watch for all welding operations, this position would conflict with the NRC staff's position on fire watches. To avoid confusion and possible conflicting guidance, Regulatory Position C.2 has been revised so that Subdivision 3.2.3 of ANSI N45.2.3-1973 is now considered part of the guide.

The deficiencies in ANSI N45.2.3-1973 identified above have been brought to the attention of the responsible standard's committee and revision to the standard to correct these deficiencies is presently in progress.

Value/Impact

The value of this change is that it will eliminate any confusion or potential conflict concerning guidance on fire protection and prevention. There should be no impact, because the NRC's staff position and guidance concerning fire protection and prevention activities, including the stationing of fire watches, is set forth more clearly and in much greater detail in other documents.

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