



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

~~FOR~~
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JUL 8 1980

MEMORANDUM FOR: Robert B. Minogue, Director
Office of Standards Development

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: CONCURRENCE ON REGULATORY GUIDE 1.141

You requested my concurrence on your memorandum to E. L. Hill authorizing the printing and distribution on Regulatory Guide 1.141, Revision 1, "Containment Isolation Provisions for Fluid Systems," I do not have any problem with the "Regulatory Position" section of the guide, but I am troubled by the "Implementation section. My general comments regarding implementation requirements for all future regulatory guides are:

1. I don't think NRC should be bound by implementation requirements approved by the R³C prior to the accident at TMI-2. Our entire thought process regarding the need for implementing new requirements on plants that already have an operating license has changed drastically in the past year.
2. We should avoid designating that implementation should be decided on a "case-by-case" basis. Rather we should provide as explicit as possible instructions on the implementation of each requirement of a regulatory guide for plants that are operating, and for plants in various stages of licensing review.

Based on these general comments, I am requesting that the Office of Standards Development take the lead in preparing a matrix which presents proposed implementation requirements for each position of the subject regulatory guide, for each class of plant (e.g., CP's OL's, operating plants, etc.). If necessary, an individual position may be subdivided. For example, requirement 4b may continue to have a different implementation date for operating plants than requirements 4a and 4c. By copy of this memorandum, I am requesting that the Containment Systems Branch of the NRR Division of Systems Integration provide assistance to you in developing an appropriate implementation matrix.

I believe such a matrix, if properly developed, would satisfy my general comments cited above. Further, such a matrix would avoid possible inconsistencies between the implementation we required as a result of the recommendations in NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations" and those described in the subject regulatory guide.

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JUL 8 1980

Harold R. Denton

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I also enclose for your information a memorandum from W. R. Butler to G. W. Knighton, DSI comments on ANSI/ANS 56.2 (May 8, 1980). Comment 1 should be considered for future revisions of this Regulatory Guide and Comment 2 will be satisfied by the matrix discussed above.

Original of 10/10/80
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulations

Enclosures:

1. Memo to E. L. Hill from R. Minoque, "Issuance of Regulatory Guide"
2. Memo to Regulatory Guide Distribution List (Div. 1) from Minoque, "Regulatory Guide 1.141, Revision 1,..."
3. Memo to G. Knighton from W. Butler dated 5/8/80, "DSI Comments on ANSI/ANS 56.2"

ccs w/enclosures:

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6/27/80
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E. L. Hill

ISSUANCE OF REGULATORY GUIDE

Please have Regulatory Guide 1.141, Revision 1, "Containment Isolation Provisions for Fluid Systems," printed and distributed.

Robert B. Minoque, Director
Office of Standards Development



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Regulatory Guide 1.141
Revision 1

REGULATORY GUIDE DISTRIBUTION LIST (DIVISION 1)

SUBJECT: Regulatory Guide 1.141, Revision 1, "Containment
Isolation Provisions for Fluid Systems"

Regulatory Guide 1.141 was issued for public comment in April 1978. As a result of the Three Mile Island (TMI) Nuclear Station Unit 2 accident and its subsequent assessment, it became clear that improved guidance concerning containment isolation provisions was needed. Revision 1 to Regulatory Guide 1.141 has been expanded to provide this improved guidance.

NRC procedures regarding the development of regulatory guides normally require issuance for a second public comment period when a proposed regulatory guide undergoes substantial revision. In this case, the revision to the guide was developed in consideration of guidance provided in NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," which specifies short-term recommendations following an NRC assessment of the TMI accident. NUREG-0578 has been available to the public since its issuance in July 1979 and implementation of its recommendations is currently underway throughout the nuclear industry.

Since the guidance includes measures to provide additional radiation protection to the public and since the guidance has been, for the most part, widely available, Revision 1 to Regulatory Guide 1.141 is being issued as an active guide. However, this revision represents the first opportunity for public review of the staff position as a consolidated document. For this reason, it is being provided to all addressees on the Division 1 distribution list. Comments on regulatory guides are encouraged at all times, and comments on this guide will be particularly helpful to the NRC staff in evaluating the need for another revision to this guide. Comments will be most useful if they are submitted within two months of the publication of the guide.

Robert B. Minogue, Director
Office of Standards Development