

WILLIAM L. STEWART  
Senior Vice President

M. MAYFIELD

992  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, Virginia 23060  
804-273-3551

DS09

USNRC  
OFFICE OF ADMINISTRATION

'94 FEB 10 P2:47

S8FR0471



11/16/93

VIRGINIA POWER

2

February 4, 1994

Rules Review and Directives Branch  
Division of Freedom and Information and  
Publications Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 93-670  
NL&P/RBP

Gentlemen:

**COMMENTS ON DRAFT REGULATORY GUIDES  
DG-1023 AND DG-1025**

Virginia Power has reviewed the Nuclear Regulatory Commission (NRC) draft regulatory guides published in the Federal Register dated October 1, 1993. The draft regulatory guides are identified as DG-1023, "Evaluation of Reactor Pressure Vessels With Charpy Upper-Shelf Energy Less Than 50 Ft-Lb," and DG-1025, "Calculational and Dosimetry Methods for Determining Pressure Vessel Fluence." DG-1023 is being developed to provide guidance on methods acceptable to the NRC staff for evaluating reactor pressure vessels when the Charpy upper-shelf energy falls below the 50 ft-lb limit specified in NRC's regulations. DG-1025 is being developed to describe methods and assumptions acceptable to the NRC staff for determining the reactor pressure vessel neutron fluence.

We are in favor of the development of these draft regulatory guides and believe that they will be useful to both the industry and the NRC. We endorse the Nuclear Management and Resources Council (NUMARC) comments sent separately to the NRC on this issue and highlight their specific comments concerning the requested changes to DG-1025.

Very truly yours,

for W. L. Stewart

9402160020 940204  
PDR REGGD  
XX. XXX C PDR

cc: Mr. Ron Simard  
Director, Industry Relations and Administration Division  
Nuclear Management and Resources Council  
1776 Eye Street, N. W.  
Suite 300  
Washington, D.C. 20006-3706