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Environmental Qualification of Certain Electrical Equipment Important to Safety for Nuclear Power Plants

Comment On: NRC-2020-0245-0001

Environmental Qualification of Certain Electrical Equipment Important to Safety for Nuclear Power Plants

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Comment (2) of William Horin on FR Doc # 2020-27717

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Organization: Nuclear Utility Group on Equipment Qualification

General Comment

See attached file(s)

Attachments

NUGEQ Request for Extension of Comment Period Draft RG 1.89 Rev 2 Final

NUCLEAR UTILITY GROUP ON EQUIPMENT QUALIFICATION

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January 31, 2021

Mr. Meraj Rahimi, Chief
Regulatory Guidance and Generic Issues Branch
Division of Engineering
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subj: *Nuclear Utility Group on Equipment Qualification* Request for Extension of Comment Period Regarding Draft Regulatory Guide, “Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants”

Dear Mr. Rahimi:

The *Nuclear Utility Group on Equipment Qualification* (“NUGEQ” or “Group”), hereby requests an extension of time for comments on draft Regulatory Guide DG-1361, “Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants,” which is to become Revision 2 of Regulatory Guide 1.89, of the same title. See 85 Fed. Reg. 81958, December 17, 2020. The Group represents approximately 75% of the operating nuclear power plants in the United States with respect to environmental qualification (“EQ”) of electrical equipment pursuant to 10 CFR 50.49. The Group was formed with that purpose in 1982.

With this letter, the Group requests a 60 day extension of the proposed comment period, to April 16, 2021. The Group appreciates the dedicated efforts of the NRC in this arena, and we look forward to fruitful discussions on the topic. We believe that 60 days is a reasonable request in that this particular proposed revision has been noted by the NRC in various contexts for over a quarter of a century. However, the draft release on December 17, 2020, was the **first time** the revision in any context was made available to the public.

The Group also requests an opportunity to meet with the NRC Staff in a public meeting prior to the end of the comment period in order to discuss critical regulatory matters associated with this new document. Such matters supporting the meeting, and more detailed background justifying the extension, include (1) the fundamental regulatory purposes of the proposed revision in that it extends beyond the stated purpose of “guidance acceptable to the NRC staff for

compliance with 10 CFR 50.49,” (2) the potential application of the proposed revision of Regulatory Guide 1.89 in various non-EQ regulatory arenas which necessitates review and coordination by multiple disciplines within plants and organizations to ascertain its potential implications to multiple aspects of plant licensing bases, (3) the potential for constructive backfitting on operating plants not committed to the revision but for which new or changed interpretations of fundamental existing qualification positions are set forth in the proposed revision, (4) the path for consideration of issues presented by the industry for over 25 years which are not acknowledged by the NRC in this draft Regulatory Guide 1.89, (5) the NRC’s long-time recognition of the benefits of interface with the industry on EQ issues although no interaction has occurred on this draft Regulatory Guide,¹ and (6) that there are no pending safety or regulatory reasons with respect to current or future plants to rush through a revision of a document anticipated for decades on an arbitrary abbreviated schedule.

We have discussed this request with the Nuclear Energy Institute, and they have indicated concurrence with the effort to obtain additional time and opportunity to discuss the issues presented.

Thank you in advance for your consideration of this request.

Respectfully submitted,

William A. Horin

William A, Horin, Counsel
Nuclear Utility Group on Equipment Qualification

cc: Mr. Michael Eudy, Office of Nuclear Regulatory Research
Mr. Matthew McConnell, Office of Nuclear Reactor Regulation

¹ See e.g., Memorandum from Michael E. Mayfield, Director, Division of Engineering Technology, Office of Nuclear Regulatory Research, to Charles A. Castro, Acting Director, Division of Engineering, Office of Nuclear Reactor Regulation, “EQ Programmatic Review Report: Inter-Agency Team’s Report,” May 12, 2002 (ML021790551), Response to Recommendation 3, at p.3.