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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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General Comment

See attached file(s)

Attachments

NUGEQ Initial Comments Observations for Draft Regulatory Guide 1.89 Rev 2 - February 16 - 2021

NUCLEAR UTILITY GROUP ON EQUIPMENT QUALIFICATION

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February 16, 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: Initial Overview Comments and Bases for Public Discussions During Reopening Period by the *Nuclear Utility Group on Equipment Qualification* Regarding Draft Regulatory Guide, DG-1361, “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 submits limited initial overview comments on the proposed Revision 2 to Regulatory Guide 1.89 (“RG 1.89 R2”), in accordance with the original schedule proposed by the NRC in the *Federal Register* notice requesting comments on draft Regulatory Guide DG-1361. The Group and other stakeholders have requested an extension on the initial comment period. We understand that the extension, in the form of a reopening, of the comment period has been granted and will be published shortly in the *Federal Register*.

We extend our appreciation to the NRC staff in providing for the reopening. We also extend our appreciation to the NRC for having moved forward on preparing draft RG1.89 R2. As several of our observations during the initial comment period indicate, there has been discussion over a long period on many areas to be included in the revision. Current NRC staff has been diligent in moving this draft guide effort forward, as was also accomplished in addressing issues which arose during the EQ DBA inspections.

We want to emphasize the importance of public meetings, as illustrated during the EQ DBA inspections, in reaching an understanding on EQ issues. We believe this draft regulatory guide process would benefit as well from such meetings. We further urge that initial meetings take place during the reopened comment period. That effort will help focus comments, achieve a better understanding of the Commission’s ultimate goals for this revision, and likely reduce post-

comment period meeting requirements (also anticipated to be appropriate and beneficial) and provide ultimately for a more effective resolution of the issues presented.

In that regard, we provide below several of our initial observations as to which timely discussion would promote an understanding by all interested parties of the issues, including NRC's overall intentions with the RG 1.89 R2 revisions. That understanding should help focus formal public comments when filed.

Accordingly, the Topics below are offered as illustrations of the above points and we ask the NRC staff to consider these in moving forward with this proposed Revision 2 to RG 1.89 review process.

Select Initial Comments and Examples of Topics Benefitting From Future Public Meetings

Regulatory Guide Scope (*Topic 1*): The scope and focus of the proposed revision to Regulatory Guide (RG) 1.89 (DG-1361) appears to have been expanded beyond just describing another method acceptable to the staff for satisfying 10 CFR § 50.49.

Example: The draft guide misinterprets the language of the governing regulation § 50.49. For instance, it incorrectly describes the scope of application to reach beyond the “design basis accident” conditions to cover environmental stressors from “design basis events.” Several parts of DG-1361 inappropriately use the term “design-basis events” to establish its scope in lieu of the proper scope of “design basis accidents” specified in 10 CFR §§ 50.49 (d)(1), (d)(2), (d)(3) and (e).

Positions Constituting Potential Backfits (*Topic 2*): There are multiple examples of new regulatory positions that have backfit or forward fit implications.

Example: DG-1361, Section C.1.j states that “*Activation energy values should be based on the testing of the specific compound used in the equipment and on the most relevant material property and property endpoint (i.e., failure mechanism). Of note, the activation energy should be selected based on the temperature range of the equipment in service to ensure that the equipment remains functional during and following a design basis event.*” As worded, this guidance represents multiple new limitations on the selection and justification for activation energies compared to Section C.5.c of RG 1.89, R1 relied upon in licensee licensing bases and vendor long-established accepted practices.

Applicability to Different Facilities (*Topic 3*): The proposed revision to RG 1.89 needs to be organized in a manner that clearly differentiates the guidance related to Part 52 plants from the guidance related to Part 50 plants.

Example: The proposed change to the guidance and Appendix D, “Qualification in the Radiation Environment” regarding the use of alternate source term (AST) is an example where

the DG is primarily focused on Part 52 plants. While the DG does recognize RG 1.183, “Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors,” it does not recognize that Part 50 plants continue to use radiological source terms for EQ that are based on TID-14844, “Calculation of Distance Factors for Power and Test Reactors.”

Anticipated Industry/NRC EQ Guidance Areas (*Topic 4*): The proposed revision does not include or reflect consideration of burden reduction topics that the staff deferred to a future revision of RG 1.89.

Example: In 2004, the NRC responded to many questions posed by NUGEQ in the spirit of ongoing and developing efforts in arenas related to industry and NRC efforts to focus the application of regulations to reduce licensee regulatory burden, consider risk-informed application of requirements, eliminate inconsistent application of regulations with the ultimate goal of assuring safety while reducing costs. Although the staff was interested in those topics, they took the position that many of the topics could be dealt with in other contexts, citing the future revision of Regulatory Guide 1.89 as one path.

Completeness of EQ Regulatory References (*Topic 5*): The proposed revision does not currently address or reflect all of the relevant regulatory guidance or regulations related to 10 CFR § 50.49.

Example: 10 CFR § 50.69, “Risk-Informed categorization and treatment of structures, systems and components for nuclear power reactors” is an example of a regulation that is not addressed but is relevant to the guidance in DG-1361.

We thank you for your consideration.

Respectfully submitted,

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