

February 9, 2021

Office of Administration
ATTN: Program Management, Announcements and Editing Staff
Mailstop: TWFN-7A06
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Request for an Extension of Comment Period on Draft Regulatory Guide, DG-1361, "Environmental Qualification of Certain Electric Equipment Important To Safety for Nuclear Power Plants," Docket ID NRC-2020-0245

REFERENCES:

1. Environmental Qualification of Certain Electrical Equipment Important to Safety for Nuclear Power Plants, 85 Fed. Reg. 81,958, Dec. 17, 2020.
2. Draft Regulatory Guide DG-1361, "Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants," Dec. 2020.
3. Regulatory Guide Periodic Review, Regulatory Guide 1.89, Revision 1, Dec. 2018 (ADAMS Accession No. ML18354A862).

In a Federal Register Notice dated December 17, 2020 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued for public comment draft Regulatory Guide DG-1361 (Reference 2), requesting that comments be submitted by February 16, 2021. NuScale requests an extension of the comment period of 60 days to April 16, 2021.

Revision of Regulatory Guide 1.89 impacts NuScale's development and deployment of its small modular reactor nuclear power plant design. DG-1361, which proposes to endorse the dual logo IEC/IEEE Standard 60780-323, is a substantial revision to the existing guidance that has been in effect for over 35 years. Dual logo IEC/IEEE Standard 60780-323 expands beyond compliance with 10 CFR 50.49 by, for example, addressing electromagnetic compatibility and mild environment qualifications. These changes have far-reaching impacts and present potential unintended consequences.

Because of the scope and importance of this revision, NuScale requests additional time to analyze the proposed changes and engage with associated stakeholders. The last periodic review of Regulatory Guide 1.89 indicates that while revision is warranted to reduce resources and gain efficiencies related to existing guidance deficiencies, the revision is not needed to resolve a safety issue or other pressing concern. Therefore, a modest extension of the public comment period does not jeopardize public health and safety.

If this extension request is granted, NuScale further requests an opportunity to meet with the NRC Staff in a public meeting well in advance of the end of the extended comment period in order to assist in our development of comments. NuScale seeks to better understand ambiguous language in the draft regulatory guide to ensure our comments are responsive to the NRC Staff's intentions.

For the reasons given in the previous paragraphs, NuScale requests an extension of the comment period of 60 days to Friday, April 16, 2021.

If you have any questions, please contact Cyrus Afshar at (541) 360-0609 or at CAfshar@nuscalepower.com.

Sincerely,



Carrie Fosaaen
Director, Regulatory Affairs
NuScale Power, LLC