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ADD: Jim Steckel, Mary
Neely
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Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants

Comment On: NRC-2020-0252-0001

Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants

Document: NRC-2020-0252-DRAFT-0004

Comment on FR Doc # 2021-09728

Submitter Information

Email: atb@nei.org

Organization: Nuclear Energy Institute

General Comment

See attached file(s)

Attachments

06-29-21_NRC_DG 1371 Comments

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June 29, 2021

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

Subject: Industry Comments on Draft Regulatory Guide (DG) 1371, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," 85 FRN 24672-24673; Docket ID NRC-2020-0252

Submitted via Regulations.gov

Project Number: 689

Dear Program Management, Announcements and Editing Staff:

On behalf of the Nuclear Energy Institute's (NEI)¹ members (hereinafter referred to as industry), we provide the following comments on DG-1371, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants." We appreciate the opportunity to comment on the draft revision to Regulatory Guide 1.26.

In our review, we noted that the draft regulatory guide revision could be enhanced by better clarifying the separation between the applicability of the ANSI standard and the implementation of 50.69, particularly in the introduction and conclusion. Additionally, in Table 1 of Appendix A, Q Group B requires ASME Section III Class 2; this would not be the case for plants with 50.69 implemented. If a component is categorized as LSS, it is out of scope of the O&M codes and alternative treatments can be applied. We recommend clarifying that Table 1 of Appendix A is not applicable to plants with 50.69.

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Program Management, Announcements and Editing Staff

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We encourage NRC to consider all stakeholder comments prior to finalizing the revision to this regulatory guide. Please contact me at yka@nei.org or (202) 739-8101 with any questions about the content of this letter or the attached comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria K. Anderson".

Victoria K. Anderson

c: Mr. Thomas Scarbrough, NRR
Mr. James Steckel, RES