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# PUBLIC SUBMISSION

**Docket:** NRC-2020-0252

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-0005

Comment on FR Doc # 2021-09728

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## Submitter Information

**Email:** agurr@nuscalspower.com

**Organization:** NuScale Power, LLC

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## General Comment

NuScale Power, LLC Comments on NRC-2020-0252.

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## Attachments

LO-104102 - Comments on draft RG-1.26 -Signed

July 6, 2021

Docket No. NRC-2020-0252

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

**SUBJECT:** Submittal of Comments on DG-1371, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," Docket ID NRC-2020-0252

**REFERENCES:**

1. "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," 86 Fed. Reg. 24672, May 7, 2021
2. Draft Regulatory Guide DG -1371, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," issued April 2021.

In a Federal Register Notice dated May 7, 2021 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued for public comment the document DG-1371 (Reference 2), requesting that comments be submitted no later than July 6, 2021.

The attachment to this letter provides comments of NuScale Power, LLC (NuScale) on DG-1371.

If you have any questions, please contact Rebecca Norris at 541-602-1260 or at [RNorris@NuScalePower.com](mailto:RNorris@NuScalePower.com).

Sincerely,



Mark W. Shaver  
Manager, Licensing  
NuScale Power, LLC

**Attachment:** Comments on U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1371 (Proposed Revision 6 of Regulatory Guide 1.26), "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants"

<b>Comments on</b> U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1371 (Proposed Revision 6 of Regulatory Guide 1.26) Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants			
No.	Page/Section/Paragraph	Comment	Proposed Resolution
1.	General	The technical basis for elevating all important to safety (ITS) items to Quality Group C is unclear.	Add technical basis for the reason why ITS items need to be Quality Group C, or remove requirement.
2.	General	The term “important to safety” is ambiguous.	Consider defining this term for clarity to ensure proper scoping and implementation.
3.	Section A, Introduction	There is an extra bullet under Applicable Regulations and at the top of page 2, between “...Section III, ‘Rules for Construction of Nuclear Facility...’ and “...Components,’ of...”	Remove bullet.
4.	Section B, Discussion, Key Safety Principles	<p>This section contains the statements,</p> <p><i>A user of RG 1.26 should be aware of the differences in the safety classification process in RG 1.201 when 10 CFR 50.69 will be implemented.</i></p> <p><i>An applicant or licensee may request the application of 10 CFR 50.69 as part of an alternative classification system for components in its nuclear power plant, as described in Appendix A to this RG.</i></p> <p>RG 1.26, Appendix A, seemingly now includes information that should be contained in RG 1.201.</p>	<p>Rewrite to state,</p> <p><i>An applicant or licensee may request the application of 10 CFR 50.69 as part of an alternative classification system for components in its nuclear power plant, as described in Appendix A to RG 1.201.</i></p> <p>RG 1.201 describes a method that the NRC staff considers acceptable for use in complying with the Commission’s requirements in §50.69 with respect to the categorization of SSCs that are considered in risk-informing special treatment requirements.</p>

<b>Comments on</b> U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1371 (Proposed Revision 6 of Regulatory Guide 1.26) Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants			
No.	Page/Section/Paragraph	Comment	Proposed Resolution
5.	Section C, Paragraphs 2.d and 3.c	<p>Both Item C.2.d and Item C.3.c make use of the word “and” indicating that all conditions need to be met to meet the classification requirements of the respective quality group.</p> <p><i>(C.2.d) those portions of the steam and feedwater systems of pressurized-water reactors extending from and including the secondary side of steam generators up to and including the outermost containment isolation valves, and connected piping up to and including the first valve (including a safety or relief valve) that is either normally closed or capable of automatic closure during all modes of normal reactor operation; <u>and</u></i></p> <p><i>(C.3.c) systems or portions of systems that are connected to the reactor coolant pressure boundary and are capable of being isolated from that boundary during all modes of normal reactor operation by two valves, each of which is either normally closed or capable of automatic closure; <u>and</u></i></p>	Change these instances of “and” to “or.”

<b>Comments and Review of</b> U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1371 (Proposed Revision 6 of Regulatory Guide 1.26) Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants			
No.	Page/Section/Paragraph	Comment	Proposed Resolution
6.	Section C, Paragraph 3d, Quality Group C	The draft guidance revises the threshold for classification of systems containing radioactive material as Quality Group C from “0.5 rem to the whole body or its equivalent to any part of the body” to “0.1 rem total effective dose equivalent”. The basis is unclear for changing the dose criteria.	Revise requirement to 0.5 rem total effective dose equivalent, or provide brief explanation for the change in Sec B “Reason for Revision.”
7.	Appendix Section A-12, Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors	RG 1.26, Appendix A, seemingly now includes information that should be contained in RG 1.201.	<p>Keep the special treatment and classification of information contained in RG 1.201 rather than scattering it across multiple RGs.</p> <p>RG 1.201 describes a method that the NRC staff considers acceptable for use in complying with the Commission’s requirements in §50.69 with respect to the categorization of SSCs that are considered in risk-informing special treatment requirements.</p>