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# PUBLIC SUBMISSION

ADD: Michael Eudy,  
Kyle Song, Mary Neely  
Comment (2)  
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**Docket:** NRC-2021-0141

Evaluating the Habitability of a Nuclear Power Plant Control Room during a Postulated Hazardous Chemical Release

**Comment On:** NRC-2021-0141-0001

Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release

**Document:** NRC-2021-0141-DRAFT-0004

Comment on FR Doc # 2021-16096

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## Submitter Information

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**Organization:** NuScale Power, LLC

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## General Comment

Attached are the NuScale comments for NRC-2021-0141 on DG-1387.

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## Attachments

LO-105940 - NuScale FRN Comments on DG-1387

August 27, 2021

Docket No. NRC-2021-0141

Office of Administration  
ATTN: Program Management, Announcement and Editing Staff  
Mailstop: TWFN-7A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** NuScale Power, LLC Submittal of Comments on Draft Regulatory Guide DG-1387, "Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," Docket ID NRC-2021-0141

**REFERENCES:**

1. "Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," 86 Fed. Reg. 40661, July 28, 2021
2. Draft Regulatory Guide DG-1387, "Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," July 2021

In a Federal Register Notice dated July 28, 2021 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued for public comment the document DG-1387 (Reference 2), requesting that comments be submitted no later than August 27, 2021.

The attachment to this letter provides comments of NuScale Power, LLC (NuScale) on DG-1387.

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

Sincerely,



Carrie Fosaaen  
Director, Regulatory Affairs  
NuScale Power, LLC

Attachment: "NuScale Power Comments: U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1387, 'Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release,' Draft Rev 2"

<b>NuScale Power Comments</b> U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1387 EVALUATING THE HABITABILITY OF A NUCLEAR POWER PLANT CONTROL ROOM DURING A POSTULATED HAZARDOUS CHEMICAL RELEASE, RG 1.78 Draft Rev 2			
Comment #	Section	Comments/Basis	Recommendation
1.	Last paragraph of Section 1.2, page 9	<p>This appears to be a potentially unintended change from an "or" statement to an "and" statement:</p> <p>"...does not exceed the specified number by traffic type and the total weight less than the quantity shown in Table 2."</p>	<p>Change to Revision 1 wording:</p> <p>"Frequent shipments, i.e., shipments exceeding the specified number by traffic type, need not be considered in the analysis if the quantity of hazardous chemicals is less than the quantity shown in the table in Appendix A (adjusted for the appropriate toxicity limit, meteorology, and control room air exchange rate)."</p>
2.	Last paragraph of Section 1.2, page 9	<p>If original wording from Comment 1 is maintained, the draft states that mobile sources need not be considered if "...the total weight less than the quantity in Table 2."</p>	<p>Change to "...the total weight <b>is</b> less than..."</p>
3.	Section 3.1	<p>Current guidance states: "...concentrations exceeding the Table 1 for longer..."</p>	<p>Change to "...concentrations exceeding <b>those in</b> Table 1 for longer..."</p>