

From: Hall, J. Brian <halljb@westinghouse.com>

Sent: Monday, November 01, 2021 11:32 AM

To: Raynaud, Patrick <Patrick.Raynaud@nrc.gov>

Subject: [External_Sender] Draft Regulatory Guide 1382 (RG 1.245 Rev 0), Preparing Probabilistic Fracture Mechanics (PFM) Submittals

ADD: Matthew Gordon, Patrick Raynaud, Kyle Song, Mary Neely
Comment (3)
Publication Date: 9/23/2021
Citation: 86 FR 52927

Patrick,

I missed the deadline for submitting comments on DG-1382. A couple of us reviewed DG-1382, but not having been intimately involved in the process over the last few years, our comments are not as substantial as EPRI's. However, we do have some minor comments as follows:

Figure C-1: step 4: "Determine a set of sensitivity studies" could be performed in the analysis plan.

Figure C-1: step 5: "Iterate on the analysis process to refine model results"; the analysis plan should have an established acceptance criteria. Suggest deleting this bullet.

2.3, 4th bullet: What does "rare probability" mean? e.g.: Value or distribution

Table C-3: M-4: Does 'well-established' mean published in a peer-reviewed journal (see M-5)? Well established could be internal to a company and not necessarily to the entire industry.

2.8, 4th line "...would not change significantly, if..."

Definitions:

"Important variable" is not used in the text.

"Random variable" is only used in other definitions.

-Brian

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