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Docket: NRC-2022-0036
Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident

Comment On: NRC-2022-0036-0001
Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident; Public Comment Period Extended

Document: NRC-2022-0036-DRAFT-0004
Comment on FR Doc # 2022-02562

Submitter Information

Email: areeve@nuscalepower.com
Organization: NuScale Power LLC.

General Comment

See attached file, NuScale Power comments on Draft Regulatory Guide DG-1385

Attachments

NuScale Power comments on Draft Regulatory Guide DG-1385

March 4, 2022 Docket No. NRC-2022-0036

Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: NuScale Power, LLC Submittal of Comments on Draft Regulatory Guide DG-1385, "Water Sources for Long-Term Recirculation Cooling Following A Loss-of-Coolant Accident," Docket ID NRC-2022-0036

REFERENCES:
1. "Water Sources for Long-Term Recirculation Cooling Following A Loss-of-Coolant Accident," 87 Fed. Reg. 7209, February 8, 2022
2. Draft Regulatory Guide DG-1385, "Water Sources for Long-Term Recirculation Cooling Following A Loss-of-Coolant Accident," January 2022 (ML21266A185)

In a Federal Register Notice dated February 8, 2022 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued for public comment the document DG-1385 (Reference 2), requesting that comments be submitted no later than March 3, 2022.

The attachment to this letter provides comments of NuScale Power, LLC (NuScale) on DG-1385.

This letter makes no regulatory commitments and no revisions to any existing regulatory commitments.

If you have any questions, please contact Rebecca Norris at 541-452-7539 or at 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-1385: 'Water Sources for Long Term Recirculation Cooling Following a Loss-of-Coolant-Accident, RG 1.82 Draft Rev 5'"

NuScale Power Comments U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1385, Proposed Revision 5 to Regulatory Guide 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-Of-Coolant-Accident"			
Comment #	Section	Comments/Basis	Recommendation
1.	Purpose, Applicability	The Purpose section references use of the regulatory guide (RG) relative to the following structures, systems, or components (SSCs) only: sumps, suppression pools, emergency core cooling system (ECCS) pumps, and containment heat removal pumps. In addition, all of the regulatory positions in Section C are related to maintaining ECCS pump performance and net positive suction head (NPSH). The Applicability section expands applicability of the RG beyond the scope of the aforementioned SSCs to all licensees subject to 10 CFR Part 20, Appendix I of 10 CFR Part 50, and to all holders of and applicants for a power reactor combined license, design certification, standard design approval, or manufacturing license under 10 CFR Part 52. This is incorrect because the RG cannot be used as guidance for designs that do not contain any of the SSCs mentioned in the Purpose section.	Revise the Applicability section to be more precise regarding scope of applicability as follows: "This RG applies to nuclear power reactor designers, applicants, and licensees of LWR designs that utilize pumps to perform emergency core cooling or containment heat removal functions and are subject to 10 CFR Part 50 "Domestic Licensing of Production and Utilization Facilities" or 10 CFR Part 52 "Licenses, Certifications, and Approvals for Nuclear Power Plants"."

2.	C.1	The section states: “This section includes regulatory positions on design criteria, performance standards, and analysis methods that relate to all water-cooled reactor types (Section C.1.1)…” The regulatory positions are not relevant to reactor designs that do not contain ECCS sumps, suppression pools, suction strainers, and debris interceptors.	Revise the section to state: “This section includes regulatory positions on design criteria, performance standards, and analysis methods that relate to water-cooled reactor types that contain ECCS pumps (Section C.1.1)…”
3.	C.1.1	The section states: “1.1 Regulatory Positions Common to All Water-Cooled Reactors Research, analysis, and lessons learned have shown that in many areas, similar approaches to performing the long-term recirculation capability evaluation are appropriate for all water-cooled reactors.” The regulatory positions in this section are not relevant to reactor designs that do not contain ECCS sumps, suppression pools, suction strainers, and debris interceptors.	Revise this section to state: “1.1 Regulatory Positions Common to All Water-Cooled Reactors with ECCS Pumps Research, analysis, and lessons learned have shown that in many areas, similar approaches to performing the long-term recirculation capability evaluation are appropriate for all water-cooled reactors with ECCS pumps.”