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Docket: NRC-2022-0063
Performance-Based Containment Leak Test Program

Comment On: NRC-2022-0063-0001
Performance-Based Containment Leak Test Program

Document: NRC-2022-0063-DRAFT-0001
Comment on FR Doc # 2022-24998

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General Comment

See attached public comments

Attachments

Harrison Bourgoin public Comments

HDB - public Comments on DG-1391 (RG 1.163, Rev 1)

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General comments:

1. In multiple locations there is the following error statement that will need to be corrected:
"Error! Reference source not found."

2. Clarification on what happens if a plant is already on 3A is required, what actions are required? Recommending that if a site has already adopted 94-01 Rev 3A then no additional information needs to be submitted to the NRC and the affected site may update the APP J program to utilize ANS 56.8 - 2020 without further submittals or NRC approval.

Recommend that if a plant is already on 94-01 3A no additional submittal (LAR) or NRC approval is required to adopt DG-1391.

Recommend updating conditions specifying that no additional action required if already adopted 3A.

3. Some plants have been granted alternates to 10 CFR Part 100. Does language need to be added to address this potential gap.

4. The maximum allowable leakage rates (La) are typically stated in Tech Specs as a mass leakage rate (percent weight per day) rather than a volume leakage rate.

Comments concerning NRC conditions:

1. Recommend deletion/removal of condition 3: This condition is a new condition with respect to the APP J and not part of NEI 94-01. This condition appears to apply more to ASME Section XI IWE inspection program and conditions should reside in documents directing the performance of the IWE inspections. This document already states under the containment inspection section (Section B, Containment inspections) that, " Based upon operating experience, the instances of through-wall corrosion and fatigue degradation of metallic liners and shells that have occurred have been detected by visual examinations under the IWE program, not by ILRTs.", indicating that the current IWE program is sufficient and any changes to or conditions to should be not be applied via the APP J RG.

2. Recommend Revision to condition 4 to incorporate language from 94-01 2A SER section 3.1.4. to account for NRC condition for major and minor modifications. Clarifying that Type A test is not required if the condition specified in revision 2-A SER condition 3.1.4.

3. Recommend deletion/removal of condition 6: This condition is duplicate and is not needed since 94-01 3A already addresses the initial test intervals for all test types A, B, and C which ensures appropriate satisfactory performance history for all test types.

HDB - public Comments on DG-1391 (RG 1.163, Rev 1)

Recommend deletion/removal of condition 11 through 14: These conditions are duplicate to the 94-01 3A SER topical report conditions 4.1 and 4.2 (ML12221A202).