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Performance-Based Containment Leak Test Program

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Performance-Based Containment Leak Test Program

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General Comment

See attached

Attachments

Gowin Public Comments on DG

Gowin Public Comments on DG-1391 (RG 1.163, Rev 1)

No.	Section / paragraph	Comment
1	General Comment	This guide appears to be aimed at licensees that have not yet adopted NEI 94-01, Revision 3-A. Considering there are a significant number of licensees that have already adopted NEI 94-01, Revision 3-A, it would be beneficial to the industry if the guide were revised to address updated information that could be incorporated into licensee programs that already conform to NEI 94-01, Revision 3-A. See comments 4, 7 and 10 below for cases where this would be beneficial.
2	Section A, Applicable Regulations, 2nd sub-bullet	10 CFR 50.55a specifies requirements for more than inservice inspection programs. It also specifies requirement for inservice testing programs [10 CFR 50.55a (f)] and protective and safety systems requirements [10 CFR 50.55a(h)].
3	Multiple locations. First example is in Section B, Reason for Revision, 3rd paragraph	It is not clear what text or reference was intended where the bold cross reference error is shown which states, "Error! Reference source not found. Error! Reference source not found."
4	Section B, Reason for Revision, 4th (last) paragraph	This section endorses the use of NEI 94-01, Rev 3-A, EPRI Report No. 1009325, and ANS 56.8 - 2020. However, the last paragraph of this section requires submittal of a LAR to use the provision of RG 1.163, Revision 1. Recommend the guide to be revised to specifically address those licensees who have already adopted NEI 94-01, Revision 3-A to allow those licensees to also adopt ANS 56.8 - 2020 without submitting a LAR and simply referencing this guide. A significant number of US licensees have already been granted permission to the use NEI 94-01, Revision 3-A through the LAR process. The typical LAR language that licensee's have used to adopt NEI 94-01, Revision 3-A does not specifically address the edition of ANS 56.8. Therefore, it is feasible for NRC to specifically endorse the use of ANS 56.8 - 2020 for those licensees which are already approved to use NEI 94-01, Revision 3-A. Revision of this guide to simply state that ANS 56.8 - 2020 may be used in lieu of ANS 56.8 - 2002 for those licensees already approved to use NEI 94-01, Revision 3-A.

Gowin Public Comments on DG-1391 (RG 1.163, Rev 1)

No.	Section / paragraph	Comment
5	Section B, Background, 2nd paragraph	<p>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. It may be best to revise this paragraph to eliminate the units of measure all together to eliminate any confusion. For example the paragraph could say:</p> <p>“Maximum allowable leakage rates (La) are calculated in accordance with 10 CFR Part 100, “Reactor Site Criteria.” (Ref. 7) and are specified in licensee site specific Technical Specifications.”</p>

Gowin Public Comments on DG-1391 (RG 1.163, Rev 1)

No.	Section / paragraph	Comment
6	Section B, Background, Containment Inspections	<p>It is this commentor's opinion that the purpose of the original 10 CFR 50, Appendix J required containment inspection was to ensure there were no indications that could lead to containment structure failure when containment is pressurized for the Type A test. This opinion is based on the fact that the original visual examination was required to be performed just before the Type A test, the person responsible for the visual examination had to be cognizant of containment design, and there were no other specific qualification requirements such as visual acuity, lighting, etc. When 10 CFR 50, Appendix J was revised to include the performance based Option and RG 1.163, Revision 0 was published to provide the industry with a regulatory approved method to implement Option B, the guide added additional containment visual examinations to occur prior to the Type A and two other refueling outages before the next Type A (Regulatory Position 3). The stated purpose of these additional containment visual examinations was "... to allow for early uncovering of evidence of structural deterioration." However, 10 CFR 50.55a endorsement of ASME Section XI, Subsections IWE and IWL also provided similar requirements for containment visual examination intervals. These requirements are very specific with respect to frequency, personnel qualifications, and methods for implementation (e.g., lighting, etc.).</p> <p>The containment visual examination requirements in RG 1.163, Revision 0, Regulatory Position 3 are non-specific other than frequency and purpose - they do not provide requirements or qualifications for implementation.</p> <p>The containment visual examination requirements in DG-1391 (RG 1.163, Revision 1) are a less-specific duplication of containment visual examination requirements specified in 10 CFR 50.55a.</p> <p>Recommend removing the containment visual examination requirements from DG-1391 (RG 1.163, Revision 1) and simply point to 10 CFR 50.55a for containment visual examination requirements. This approach will eliminate any duplication and confusion that may be caused by differences in wording between the two regulatory requirements.</p>
7	Section C, No. 1	<p>See Comment Item 4. Recommend revising Position 1 those licensee's already approved to use NEI 94-01, Revision 3-A to use ANS 56.8 - 2020 in lieu of ANS 56.8 - 2002 (referenced in NEI 94-01, Revision 3-A)</p>

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No.	Section / paragraph	Comment
8	Section C, No. 2	This paragraph is not necessary. The proposed requirements is already provided in NEI 94-01, Revision 3-A
9	Section C, No. 3	<p>See Comment Item 6. Recommend deleting this paragraph in its entirety. As stated in Comment Item 6, there is duplication between regulatory requirements of DG-1391 (RG 1.163, Revision 1) and 10 CFR 50.55a. Also, and more importantly, this paragraph adds significant burden to the licensee and is not justified. For example, this paragraph describes new and burdensome requirements for inaccessible areas. This guide, the previous revision of RG 1.163, and NEI 94-01 do not define or describe accessible or inaccessible areas. Adding new requirements in this guide for inaccessible areas not justified by industry OE with respect to containment integrity.</p> <p>If this new requirement for inaccessible areas is not removed from the guide, then please provide adequate justification for the increased burden. In addition, if this requirement remains then additional clarification is needed to define accessible and inaccessible areas and guidelines to assist licensees in determining the extent to which inspection of inaccessible areas are expected. The new requirements for inaccessible areas, as written in this guide, are much to vague and do not provide enough information for licensees to implement the requirements in a consistent manner or as NRC expects.</p>
10	Section C, No. 4	It would be helpful to the industry if this paragraph could be revised or a new one added to include the language from the Safety Evaluation, Section 3.1.4, for NEI 94-01, Revision 2-A regarding major and minor containment repair and modifications. Specifically, add the descriptions of major and minor containment repairs and modification and also clarify that if the elements of a short duration structural test of the containment are satisfied for a major repair or modification, then a Type A test is not required and there is no need to submit an exemption or request for alternative to use the short duration structural test in lieu of a Type A test.
11	Section C, No. 6	Recommend deletion of this paragraph in its entirety. NEI 94-01, Revision 3-A already adequately addresses the requirements for initial and subsequent test intervals for Type A, B, and C tests
12	Section C, No. 11 and 12	These paragraphs are a duplicate of NRC Condition 1 in Section 4.0 of the SER for NEI 94-01, Revision 3-A (ML12221A202)

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No.	Section / paragraph	Comment
13	Section C, No. 13 and 14	These paragraphs are a duplicate of NRC Condition 2 in Section 4.0 of the SER for NEI 94-01, Revision 3-A (ML12221A202)