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Performance-Based Containment Leak Test Program

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

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Submitter Information

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General Comment

Please see attached file.

Attachments

APOG Public Comments on DG

Appendix J Owner's Group (APOG) Public Comments on DG-1391 (RG 1.163, Rev 1)

No.	Section / paragraph	Comment
1	Section A, Applicable Regulations, 2nd sub-bullet	<p>10 CFR 50.55a specifies requirements for more than inservice inspection programs.</p> <p>Recommend clarifying that it also includes: inservice testing programs [10 CFR 50.55a (f)] and protective and safety systems requirements [10 CFR 50.55a(h)].</p>
2	<p>Multiple locations.</p> <ul style="list-style-type: none"> • Section B, Reason for Revision, 3rd paragraph • Section B, Containment Inspections, 3rd paragraph • Section C, Staff Regulatory Guidance, Condition 3 	<p>This message appears in the document - "Error! Reference source not found. Error! Reference source not found." It is not clear what these references are or how they impact the document.</p> <p>Recommend correcting link.</p>
3	Section B, Reason for Revision, 4th (last) paragraph	<p>It appears this draft guide is directed at plants that have not adopted NEI 94-01, Rev 3-A. A significant number of US licensees have already been granted permission to the use NEI 94-01, Revision 3-A through the LAR process.</p> <p>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 this provision of RG 1.163, Revision 1.</p> <p>Recommend the guide to be revised to specifically address those licensees who have already adopted NEI 94-01, Revision 3-A and allow them to adopt ANS 56.8 - 2020 without submitting a LAR. Request clarification 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.</p>
4	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.</p> <p>Recommend aligning units with standard language or revise this paragraph to eliminate the units of measure all together to eliminate any confusion.</p>
5	Section B, Background, 2nd paragraph	<p>Some licensees are not fully compliant with 10 CFR 50 Part 100 because they have adopted the Alternate Source Term methodology.</p> <p>Recommend more generic language to include site specific licensing requirements.</p>
6	Section B, Background, Containment Inspections	<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. NEI 94-01 does not mention or define inaccessible areas.</p>

		<p>The containment visual examination requirements in DG-1391 (RG 1.163, Revision 1) appear to be a 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). Detailed containment visual inspection are performed in accordance with IWE per 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 3.</p> <p>Recommend revising Position 1 to specifically address those licensees who have already adopted NEI 94-01, Revision 3-A and allow them to adopt ANS 56.8 - 2020 without submitting a LAR.</p>
8	Section C, No. 3	<p>See Comment Item 6.</p> <p>Recommend deleting this paragraph in its entirety. As stated in Comment Item 5, there is duplication between regulatory requirements of DG-1391 (RG 1.163, Revision 1) and 10 CFR 50.55a.</p>
9	Section C, No. 4	<p>Revise this paragraph to clarify NEI 94-01, Rev 2 SER Condition which points to 3.1.4 for major and minor maintenance / modifications.</p> <p>Recommend this paragraph endorse the use of 3.1.4 without need to licensee to submit request for exemption to 10 CFR 50 Appendix J or request for alternative to ASME Section XI, Subsections IWE and IWL</p>
10	Section C, No. 6	<p>Recommend deletion. NEI 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.</p>
11	Section C, No. 11	<p>Recommend deletion. Duplication of SER for NEI 94-01, Revision 3-A (ML12221A202) Topical Report Condition 1.</p>
12	Section C, No. 12	<p>Recommend deletion. Duplication of SER for NEI 94-01, Revision 3-A (ML12221A202) Topical Report Condition 1.</p>
13	Section C, No. 13	<p>Recommend deletion. Duplication of SER for NEI 94-01, Revision 3-A (ML12221A202) Topical Report Condition 2.</p>
14	Section C, No. 14	<p>Recommend deletion. Duplication of SER for NEI 94-01, Revision 3-A (ML12221A202) Topical Report Condition 2</p>