

# PUBLIC SUBMISSION

SUNSI Review Complete  
Template=ADM-013  
E-RIDS=ADM-03  
ADD: Joseph Bridget  
Curran, Jim Steckel, Mary  
Neely

Comment (2)  
Publication Date: 5/3/2023  
Citation: 88 FR 27714

<b>As of:</b> 6/7/23, 1:38 PM
<b>Received:</b> June 02, 2023
<b>Status:</b> Pending_Post
<b>Tracking No.</b> lie-ngj9-cqgd
<b>Comments Due:</b> June 02, 2023
<b>Submission Type:</b> Web

**Docket:** NRC-2023-0089

Draft Regulatory Guide: Guidelines for Lightning Protection for Production and Utilization Facilities

**Comment On:** NRC-2023-0089-0001

Draft Regulatory Guide: Guidelines for Lightning Protection for Production and Utilization Facilities

**Document:** NRC-2023-0089-DRAFT-0004

Comment on FR Doc # 2023-09390

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## Submitter Information

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**Organization:** Nuclear Energy Institute

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## General Comment

See attached file(s)

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## Attachments

06-02-2023 NEI Comments on DG-1409

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June 2, 2023

Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Program Management, Announcements and Editing Staff

*Submitted via regulations.gov*

**Subject:** NEI Comments on Draft Regulatory Guide DG-1409, "Guidelines for Lightning Protection for Production and Utilization Facilities" (Docket ID NRC-2023-0089)

**Project Number: 689**

Dear Program Management, Announcements, and Editing Staff:

The Nuclear Energy Institute (NEI)<sup>1</sup>, on behalf of our members, appreciates the opportunity to comment on draft regulatory guide DG-1409 (RG 1.204, Rev. 1). NEI recognizes the importance of ensuring NRC endorsed guides and standards represent modern approaches to addressing technical requirements. However, the scope of the proposed, endorsed IEEE guides exceeds that of the technical topic being addressed (i.e., lightning protection) and the draft regulatory guidance is unclear whether the endorsed IEEE guides are intended to be used for informational purposes or strict regulatory conformance.

Each of the four (4) primary references proposed for endorsement (IEEE 665-1995, IEEE 666-2007, IEEE 1050-2004, IEEE C62.23-2017) provides limited guidance specific to lightning protection. For example, IEEE 665-1995 only contains guidance for lightning protection in Section 5.6; however, DG-1409 endorses the entire guide. These guides primarily provide guidance for grounding methods for both protection and noise elimination. Only the portions of the IEEE guides associated with lightning protection should be within the scope of this draft guide. Regulatory Guide 1.180 provides guidance for electromagnetic compatibility (EMC) issues. The broad endorsement of these IEEE guides, as currently described in the draft guide, present potential conflicts related to other regulatory guidance.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

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Additionally, the four (4) primary references proposed for endorsement (IEEE 665-1995, IEEE 666-2007, IEEE 1050-2004, IEEE C62.23-2017) are IEEE Guides, not Standards. According to the IEEE Standards Association (IEEE SA) a standard is a "document with mandatory requirements," whereas a guide is a "document in which alternative approaches to good practice are suggested but no clear-cut recommendations are made." The endorsement of these Guides results in unclear expectations regarding their intended use (i.e., informational purposes vs. conformance) since these documents provide no clear-cut recommendations, nor mandatory requirements. The NRC should clarify the intended use of these endorsed guides (and their associated secondary references) to meet regulatory requirements.

We appreciate the opportunity to provide comments on DG-1409 and encourage your consideration of NEI's comments prior to finalizing and publishing the regulatory guide. Please contact me at [adc@nei.org](mailto:adc@nei.org) or (202) 439-3698 with any questions or comments.

Sincerely,



Alan Campbell

Attachment 1: Comments on DG-1409

Cc: Roy Hardin (RES/DE/ICEEB)  
James Steckel (RES/DE/RGPMB)

Attachment 1: Comments on DG-1409

#	Section	Comment	Recommendation
1	C. Staff Regulatory Guidance	Each of the four (4) primary references proposed for endorsement (IEEE 665-1995, IEEE 666-2007, IEEE 1050-2004, IEEE C62.23-2017) provides limited guidance specific to lightning protection. For example, IEEE 665-1995 only contains guidance for lightning protection in Section 5.6; however, DG-1409 endorses the entire guide. These guides primarily provide guidance for grounding methods for both protection and noise elimination. Only the portions of the IEEE guides associated with lightning protection should be within the scope of this draft guide. Regulatory Guide 1.180 provides guidance for electromagnetic compatibility (EMC) issues. The broad endorsement of these IEEE guides, as currently described in the draft guide, present potential conflicts related to other regulatory guidance.	NRC should specify the specific sections/requirements associated with lightning protection.
2	C. Staff Regulatory Guidance	The four (4) primary references proposed for endorsement (IEEE 665-1995, IEEE 666-2007, IEEE 1050-2004, IEEE C62.23-2017) are IEEE Guides, not Standards. According to the IEEE Standards Association (IEEE SA) a standard is a “document with mandatory requirements,” whereas a guide is a “document in which alternative approaches to good practice are suggested but no clear-cut recommendations are made.” The endorsement of these Guides results in unclear expectations regarding their intended use (i.e., informational purposes vs. conformance) since these documents provide no clear-cut recommendations, nor mandatory requirements. The NRC should clarify the intended use of these endorsed guides (and their associated secondary references) to meet regulatory requirements.	NRC should clarify the intended use of these endorsed guides (and their associated secondary references) to meet regulatory requirements.