

NRCREP - Industry Comments on Draft Regulatory Guide 1173, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage"

From: "RILEY, Jim" <jhr@nei.org>  
Date: 08/28/2007 5:21 PM  
Subject: Industry Comments on Draft Regulatory Guide 1173, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage"

August 28, 2007

Rulemaking, Directives, and Editing Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-001

6/28/07  
72FR35521

(2)

RECEIVED

2007 AUG 29 AM 11:35

RULES AND DIRECTIVES  
BRANCH  
151500

**Subject:** Industry Comments on Draft Regulatory Guide 1173, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage"

**Project Number: 689**

The Nuclear Energy Institute (NEI) is pleased to submit these comments on Draft Regulatory Guide 1173 as noticed in the Federal register on June 28, 2007 (72FR35521). Overall we support this much needed updating of the Regulatory Guide and encourage the NRC to issue it after addressing the comments below.

1) Page 8 of DG 1173 states "Leakage Monitoring of Risk-Significant Areas in RCS - Critical components of the RCPB should be monitored for leakage." Please clarify the above recommendation to address whether indirect methods of monitoring the critical components of the RCPB are acceptable. For example, use of area radiation monitors to indicate potential component leakage.

2) NRC Inspection Manual, IMC 2515, Attachment 1, "Assessing Reactor Coolant System (RCS) Unidentified leakage Rate Trend," uses a statistical approach (based on an inventory balance) to determine unidentified RCS leakage action levels. How does this approach relate to the 'leakage detection instrumentation' action levels referred to throughout DG-1173? These two documents should be consistent; however, there is no indication that IMC 2515 was used as a developmental reference for the draft regulatory guide.

If you have question regarding the comments, please contact Jim Riley at 202.739.8137; [jhr@nei.org](mailto:jhr@nei.org), or Mike Melton at 202.739.8049; [mam@nei.org](mailto:mam@nei.org).

James H. Riley

James H. Riley

SUNSI Review Complete  
Template = ADM-013

file://C:\temp\GW\00001.HTM

F-REDS = ADM-03  
Add = M. Srinivasan  
(Mx50)

08/29/2007

Director, Engineering

Nuclear Energy Institute  
1776 I Street NW, Suite 400  
Washington, DC 20006  
[www.nei.org](http://www.nei.org)

P: 202-739-8137

F: 202-785-4019

M: 202-439-2459

E: [jhr@nei.org](mailto:jhr@nei.org)

nuclear. clean air energy.

This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

**Mail Envelope Properties** (46D491BE.61C : 2 : 63004)

**Subject:** Industry Comments on Draft Regulatory Guide 1173, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage"

**Creation Date** Tue, Aug 28, 2007 5:20 PM

**From:** "RILEY, Jim" <jhr@nei.org>

**Created By:** jhr@nei.org

**Recipients**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3087	Tuesday, August 28, 2007 5:20 PM
TEXT.htm	10789	
08-28-07_NRC_Comments on Draft Guide 1173.pdf	40727	
Mime.822	73674	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling  
This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User  
Junk Mail handling disabled by Administrator  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled



NUCLEAR ENERGY INSTITUTE

James H. Riley  
DIRECTOR  
ENGINEERING  
NUCLEAR GENERATION DIVISION

August 28, 2007

Rulemaking, Directives, and Editing Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-001

**Subject:** Industry Comments on Draft Regulatory Guide 1173, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage"

**Project Number: 689**

The Nuclear Energy Institute (NEI)<sup>1</sup> is pleased to submit these comments on Draft Regulatory Guide 1173 as noticed in the Federal register on June 28, 2007 (72FR35521). Overall we support this much needed updating of the Regulatory Guide and encourage the NRC to issue it after addressing the comments below.

1) Page 8 of DG 1173 states "Leakage Monitoring of Risk-Significant Areas in RCS - Critical components of the RCPB should be monitored for leakage." Please clarify the above recommendation to address whether indirect methods of monitoring the critical components of the RCPB are acceptable. For example, use of area radiation monitors to indicate potential component leakage.

2) NRC Inspection Manual, IMC 2515, Attachment 1, "Assessing Reactor Coolant System (RCS) Unidentified leakage Rate Trend," uses a statistical approach (based on an inventory balance) to determine unidentified RCS leakage action levels. How does this approach relate to the 'leakage detection instrumentation' action levels referred to throughout DG-1173? These two documents

---

<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Rulemaking, Directives, and Editing Branch

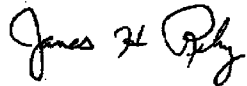
August 28, 2007

Page 2

should be consistent; however, there is no indication that IMC 2515 was used as a developmental reference for the draft regulatory guide.

If you have question regarding the comments, please contact Jim Riley at 202.739.8137; [jhr@nei.org](mailto:jhr@nei.org), or Mike Melton at 202.739.8049; [mam@nei.org](mailto:mam@nei.org).

Sincerely,

A handwritten signature in black ink that reads "James H. Riley". The signature is written in a cursive style with a large, stylized initial "J".

James H. Riley

c: Mr. Makuteswara Srinivasan, U.S. Nuclear Regulatory Commission  
NRC Document Control Desk

Mr. Joseph R. Congdon, Westinghouse

Mr. Terry A. McAllister, South Carolina Electric & Gas Company