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PROPOSED RULE **PR 50**  
**(66 FR 57001)**

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USNRC

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

December 17, 2001

January 15, 2002 (12:12PM)  
OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Secretary  
U.S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Mail Stop O-16C1  
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION - REQUEST FOR PUBLIC COMMENT -  
"STANDARDS FOR COMBUSTIBLE GAS CONTROL SYSTEM IN LIGHT-WATER COOLED  
POWER REACTORS" - Volume 66, Number 220, Federal Register 57001-  
57002

TVA appreciates the opportunity to comment on the subject  
*Federal Register* notice regarding draft rule wording for 10 CFR  
50.44. TVA believes that the draft rule represents an  
improvement and supports the draft rule change with comments as  
follows:

TVA is not aware of a need to retain the section of the  
rule on post-accident inerting for currently licensed  
plants. We support elimination of this section of the  
rule.

TVA notes that the proposed rule requires oxygen monitoring  
for plants with inerted containments. The current rule  
only requires hydrogen monitors. We do not object to the  
rule wording requiring oxygen monitors. However, we  
believe that the associated regulatory guide should permit  
Boiling Water Reactor (BWR) Mark I and Mark II plants to  
retain their current Post Accident Monitoring (PAM)  
requirements for the hydrogen and oxygen monitors provided  
one type of monitor is PAM Category 2 or higher. There  
does not appear to be a benefit in requiring plants to  
potentially upgrade oxygen monitors if the hydrogen  
monitors already are Category 2 or better. Having either  
the hydrogen monitors or the oxygen monitors classified as  
PAM Category 2 or higher provides sufficient assurance that  
monitoring of combustible gases can be accomplished.

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If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

A handwritten signature in cursive script, reading "Mark J. Burzynski". The signature is written in dark ink and is positioned above the printed name.

Mark J. Burzynski  
Manager  
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001