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

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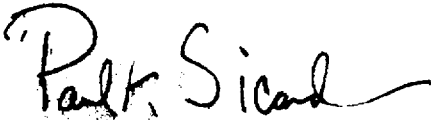
February 22, 2002 (9:16AM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Sir/Ma'am:

Attached are comments on the proposed rulemaking to 10CFR50.69, Risk-Informed Treatment of Structures, Systems, and Components, provided in response to the draft rule language in the November 21, 2001, memorandum on the subject.

Yours truly,



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Template = SEC Y-067

SEC Y-02

1. It would be preferable and less confusing to use the term "risk-significant" in place of "safety-significant" in the 50.69(a) definition section and in 50.69(f)(3). Use of the term "safety-significant" would cause more confusion with the existing term "safety related" and would improve communication of the regulatory requirements.
2. Regarding 50.69(c)(1), it should be understood that the core damage risk associated with Fire should be treated as an external initiating event, consistent with the GL 88-20 IPEEE.
3. Guidance should be provided for the term "small" in 50.69(c)(2).
4. The rule should ensure that the movement of SSC's between risk classes is adequately addressed. Changes in industry experience or due to plant modifications can potentially result in the movement of SSC's from a low risk-significant to a high risk-significant category, or vice versa.
5. In the integrated decision making process described in section 50.69(c)(2), there needs to be recognition that various levels of risk exist. While PRA is focused on core damage, there also needs to be a recognition that significantly less severe events can occur which result in clad damage (and thus gap activity releases) but no core (fuel) damage. The acceptable frequency for such events is not reflected in a PRA Core Damage Frequency and would not challenge criteria for Large Early Release Frequency. While the acceptable frequency for such events would be greater than for CDF because the consequences would be orders of magnitude lower than for core damage events, the risk associated with these relatively low consequence scenarios should be considered in the integrated decision making process.