



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

March 15, 2002

Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

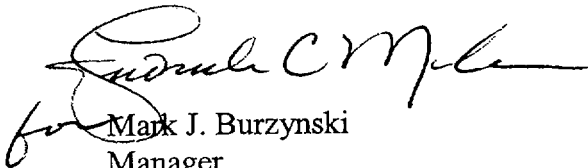
Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - REQUEST FOR PUBLIC
COMMENT - DRAFT GUIDE (DG) 1111 (VOL. 66 *FEDERAL REGISTER* 64893,
DATED DECEMBER 14, 2001)

TVA appreciates the opportunity to comment on the subject draft regulatory guide. The enclosure provides our detailed comments. In addition, we support comments made by the Nuclear Energy Institute.

If you have questions regarding our comments, please contact R. M. Brown at (423) 751-7228.

Sincerely,


for Mark J. Burzynski
Manager
Nuclear Licensing

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

Template = ADM-013

*E-RIJS = ADM-03
Gdl = A. Beranek (HFB)
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ENCLOSURE

DG 1111	Comments
Section 2.1, Paragraph 1, Page 5	In addition to RG-1.23, it would be appropriate to reference ANSI/ANS-3.11-2000, "Determining Meteorological Information at Nuclear Facilities."
Section 2.2.3, Page 8	States that the vent release mode should not be used in design basis assessments, but does not say what should be used (e.g., ground-level).
Section 2.3.2, first paragraph	The sentence, "The two intakes should not be within the same wind direction window, which is 45 degrees" The words "defined as" should be placed prior to "45 degrees" as this is a definition of wind direction window.
Section 2.3.2 (pertains to document in general)	This section appears to be written to cover the design of future plants. Many existing plants may not be able to meet the requirements specified in this section. The document should provide additional guidance for existing plants.
Section 2.3.3	The bulleted list includes many items. However, there is no guidance on how to identify the specific leakage through the items on the bulleted list. For example, the leakage through doors due to personnel movement has traditionally been given as 10 cfm and has been reviewed and considered as a valid number, averaged over time, for ingress and egress. This 10 cfm value is not provided in the DG. This is not stated in the DG. Additionally, for other items in the list, the amount of leakage and the location of leakage cannot typically be quantified. More frequently there is a general value called "unfiltered inleakage" that encompasses the items on this list and also items not on this list. Please provide more specific guidance on how x/Q relates to this list.
Section 2.3.2 and Table 3	This section does not provide guidance on when the 45 degree criteria or Table 3 is to be used. One is clearly different than the other and results in different approaches. Please provide this guidance or bounds on when the 45 degree option is valid. The table has no references and does not discuss how the values were derived. It also needs to state when the wind direction sectors are valid and when they are not. Example: Are the values in Table 3 to be used for a 720 hour period or for a two hour period. Additional guidance on the use of Table 3 is required. This comment is specifically related to control room intakes that are monitored and selection of one intake over another can be made. It is unreasonable to assume an OPERATOR will select one intake at the beginning of an event and use that one intake for the duration of the event.
Section 3.2, Page 16	The source reference for Figures 3 and 4 should be included.
Section 3.5, Page 18	For consistency with equation 10, the definition for "X(x)" should be expressed as " $\chi(x)$."
Table A-1, Page 29	A reference to this table should be added in the body of the document.
Table A-1, Page 29	Stability class would be appropriate to include in the parameter list along with acceptable temperature measurement levels to be used.