

Response to Public Comments on Draft Regulatory Guide (DG)-1387 “Evaluating the Habitability of a Nuclear Power Plant Control Room during a Postulated Hazardous Chemical Release”

On July 27th, 2021, the U.S Nuclear Regulatory Commission (NRC) published a notice in the *Federal Register* (86 FR 40661) that Draft Regulatory Guide, DG-1387, (Proposed Revision 2 Regulatory Guide (RG) 1.78), was available for public comment. The Public Comment period ended on August 27th, 2021. The NRC received comments from the organizations and people listed below. The NRC has combined the comments and NRC staff responses in the following table.

1.Martin Phalen Nuclear Energy Institute ADAMS Accession No. ML21231A192	2. Carrie Fosaaen NuSclae Power, LLC ADAMS Accession No. ML21243A369	3. Barry Quigley ADAMS Accession No. ML21243A371
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Commenter	Section of DG-1387	Specific Comments (These are the full comments as provided in each submission)	NRC Resolution
1. Martin Phalen	General	My understanding is that the correct acronym is IDLH (Immediately Dangerous to Life and Health) andNOT IDHL.	The NRC agrees with the comment and has fixed the editorial error.
2. Carrie Fosaaen	Last paragraph of Section 1.2, page 9	This appears to be a potentially unintended change from an "or" statement to an "and" statement: "...does not exceed the specified number by traffic type and the total weight less than the quantity shown in Table 2." Change to Revision 1 wording: "Frequent shipments, i.e., shipments exceeding the specified number by traffic type, need not be considered in the analysis if the quantity of hazardous chemicals is less than the quantity shown in the table in Appendix A (adjusted for the appropriate toxicity limit, meteorology, and control room air exchange rate)."	The NRC agrees with the comment and will use all suggested words and wording for the identified sentences in the Section 1.2. The staff has reworted this paragraph to be consistent with the previous wording in RG 1.78 Revision 1.

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	Last paragraph of Section 1.2, page 9	<p>If original wording from Comment 1 is maintained, the draft states that mobile sources need not be considered if "...the total weight less than the quantity in Table 2."</p> <p>Change to "...the total weight is less than..."</p>	Per the resolution of the previous comment, no response to this comment is needed and no additional changes are necessary.
	Section 3.1	<p>Current guidance states: "...concentrations exceeding the Table 1 for longer..."</p> <p>Change to "...concentrations exceeding those in Table 1 for longer..."</p>	The NRC agrees with the comment to use "those in" and to replace "...the..." in the last sentence of the Section 3.1.
3. Barry Quigley	Geneal	In revision 1, Table 1 for toxicity limits states "This table lists commonly encountered chemical but the list is not all-inclusive". This statement does not appear or concept does not appear in Revision 2. It's exclusion could lead a licensee to conclude that only the 29 chemicals listed require evaluation; this is less conservative than Revision 1.	The NRC agrees with the comment: In Section 3.1, the suggested wording "This table lists commonly encountered chemical but the list is not all-inclusive" is added. In addition, the staff added a pointer to NUREG/CR-6624 which can provide a more complete list of chemicals.