

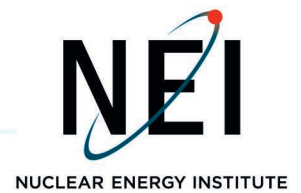
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ADD: Gabe Taylor, Markhenry
Salley, Mary Neely
Comment (1)
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December 22, 2021

Michele Kaplan
Division of Resource Management and Administration
Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Research Information Letter "Target Fragilities for Equipment Vulnerable to High Energy Arcing Faults," Docket ID NRC-2021-0213

Project Number: 689

Dear Ms. Kaplan:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, submits the following comments on Draft Research Information Letter "Target Fragilities for Equipment Vulnerable to High Energy Arcing Faults." We appreciate the opportunity to comment on this important draft information research letter, which is key to support of continued improvement in realism in available Fire Probabilistic Risk Assessment methods.

The content of this report represents the results of collaborative work that will provide more detailed insights on plant risk presented by potential High Energy Arcing Fault Events, and NEI supports its issuance following the consideration of the following comments.

- In Section 5.3, the data and text state that once the bus duct (not the bus bar) is compromised, failure should be assumed. It then appears that the target distance would be measured to the bus duct instead of the bus bar, which could result in the bus duct being inside the Zone of Influence (ZOI), but the bus bar being outside the ZOI. This is not physically logical, and should be clarified, including more details on limitations or caveats of the failure criteria (e.g., impacts of duct work ventilation).

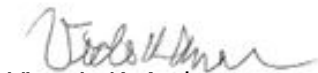
¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

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- The conclusions in Section 6 should explicitly discuss impacts on cables in conduit or cable tray covers for clarity.

We encourage NRC to consider and address all stakeholder comments on this report. Please contact me at vka@nei.org or (202) 739-8101 with any questions about the content of this letter.

Sincerely,



Victoria K. Anderson

Attachment

c: Mr. Mark Salley, RES
Mr. Gabriel Taylor, RES
NRC Document Control Desk