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July 6, 2012

Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments to Docket ID NRC-2012-0069, Reliable Hardened Containment Vents Draft Interim Staff Guidance, JLD-ISG-2012-02

Dear Ms. Bladey:

The Vermont Public Service Department (Department) hereby submits its comments to the NRC Draft Interim Staff Guidance, JLD-ISG-2012-02 Compliance per Order EA-12-050, Reliable Hardened Containment Vents.

In reviewing the requirements in the staff guidance, the Department has the following comments:

General Comment: The Department is aware that additional analysis continues to be done on the Fukushima Dai-ichi disaster. That continued analysis needs to be taken into account in the review and approval of the hardened containment venting system proposed by the licensees. The designs have to reflect the most current knowledge of what went wrong with the containment vents at Fukushima even if it causes refinements in proposed designs and additional expense to the licensees.

Requirement 1.2.5 The HCVS shall include a means to monitor the effluent discharge for radioactivity that may be released from operation of the HCVS. The monitoring system shall provide indication in the control room or other location(s), and shall be designed for sustained operation during a prolonged SBO.

Comment: In this requirement, it is not clear whether NRC believes that radiation monitoring could be fulfilled by the stack monitors if such monitors were in the vent path. The Department does not believe that would be adequate. We believe there is value to monitoring the effluent just after the valve(s), at a point that will provide affirmation that the effluent is flowing and a measurement of the gross activity at this point. Should a break in the vent path occur before the stack monitors, information on the activity and flow of effluent would not be readily available. In addition, we urge that NRC clearly state the requirements for the testing and frequency of calibration of any radiation

monitor. Finally, we ask that NRC evaluate whether there is benefit to having backup monitoring unit(s) installed.

Requirement 1.2.4 The HCVS shall include a means to monitor the status of the vent system (e.g., valve position indication) from the control room or other location(s). The monitoring system shall be designed for sustained operation during a prolonged SBO.

Comment: This requirement pertains to the importance of monitoring the status of the HVCS at all times; although the "e.g." mentions only valve position, the Department urges NRC to clarify that such monitoring should include all relevant information related thereto, such as system pressure and effluent temperature. The Department also notes that transducers that measure these parameters may experience very harsh environments that can affect their performance. Therefore, we believe this requirement should state expressly that the design and installation of these transducers must meet 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants".

Thank you for the opportunity to comment. The Department appreciates NRC's efforts to robustly address the need for HVCS reliability in our nation's nuclear plants.

Sincerely,

Elizabeth Miller
Commissioner