



July 9, 2012

Tremaine Donnell (T-5 F53)  
NRC Clearance Officer  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Office of Information Services

GL12-020

**COMMENTS ON AGENCY INFORMATION COLLECTION ACTIVITIES**  
**DOCKET ID NRC-2012-0081**  
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Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to comment on *Agency Information Collection Activities: Proposed Collection; Comment Request*, as described in the subject *Federal Register* notice.

Dominion is providing the attached comments regarding this information collection and would appreciate the NRC's consideration. If you have any questions, please contact:

Dave Bucheit at Dave.Bucheit@dom.com or (804) 273-2264

Respectfully,

A handwritten signature in dark ink, appearing to read "T. R. Huber", written in a cursive style.

T. R. Huber, Director  
Nuclear Licensing & Operations Support  
Dominion Resources Services, Inc. for  
Virginia Electric and Power Company,  
Dominion Nuclear Connecticut, Inc. and  
Dominion Energy Kewaunee, Inc.

Attachment: Dominion Comments on Agency Information Collection Activities

**ATTACHMENT****DOMINION COMMENTS ON  
AGENCY INFORMATION COLLECTION ACTIVITIES**

Question 1. Is the proposed collection of information necessary for the NRC to properly perform its functions?

The NRC issued SECY-0137 to provide the staff's proposed prioritization of the Fukushima Near-Term Task Force (NTTF) recommendations including the technical and regulatory bases for the prioritization. The staff initially prioritized the recommendations based on its judgment of the potential and relative safety enhancement which could be realized by each. The staff further concluded that none of the recommendations, when implemented, would reduce or eliminate an imminent hazard to public health and safety. In the end, the prioritization of the activities concluded that a subset, called Tier 1, would be recommended for immediate implementation based on providing the greatest safety benefit. Next, NRC conducted a series of meetings with stakeholders to gather input prior to issuing a decision on how to proceed. During these meetings, NEI introduced a concept of using portable, diverse equipment, protected from external events as a means of providing core cooling, decay heat removal and spent fuel pool instrumentation to prevent core damage given an extended loss of AC power following a beyond design basis external event. This approach is known as FLEX. It was shown that this approach could be implemented quickly and would provide most of the safety benefit that the Tier 1 items would provide. In response to Question 1, Dominion notes that each step above was necessary for the NRC to properly perform its functions.

The follow up question is "does the information have practical utility?" The answer is: as applied, no. When the series of meetings concluded, NRC issued three orders and one 50.54(f) information request letter. One of these orders was to implement a flexible mitigation strategy, which was linked with the industry proposed approach. The other two orders directed modifications to the spent fuel pool instrumentation and hardened containment vents in BWRs. The 50.54(f) information request covered the remaining Tier 1 items: walkdowns and re-evaluations for seismic and external flooding, plus emergency preparedness staffing and communications augmentation.

Regarding information requested for beyond design basis events, the industry is implementing essentially redundant safety benefits. The information requested in the 50.54(f) letter for beyond design basis events is not necessary for the NRC to properly perform its functions. The information request should be delayed until the NRC performs an assessment of the magnitude of the safety benefit from implementing FLEX. After completing this assessment, the information request should be limited to only those items that provide additional safety benefit.

Question 2. Is the burden estimate accurate?

The table below provides a comparison of NRC, NEI and Dominion's expected man-hours per unit burden associated with the information requested. Overall, the table shows that Dominion is consistent with the industry estimates and higher than the NRC estimates.

**Fukushima Response Data Collection Activities**  
**Comparison of NRC, NEI and Dominion's Expected Man-hours per Unit<sup>&</sup>**

	Flooding Walkdown	Flooding Evaluation	Seismic Walkdown	Seismic Evaluations	EP Comms. and Staffing	Totals
<i>NRC Estimates</i>	2,000	3,100	2,000	3,440 to 9,260	100	8,840 (low) to 14,660 (high)
<i>Industry Estimates (NEI)</i>	3,904	8,699	2,000	15,000 to 30,000*	498 or 636	30,101 (low) to 45,239 (high)
<i>Dominion Estimate</i>	3,829	2,992	3,575	19,545*	485	30,426

General Notes:

& NRC and Dominion estimates are per unit. NEI estimates are a mix of units and sites.

\* NEI Comment for Seismic Evaluations: This coarse estimate only represents one element of the evaluation activity - the risk assessment.