



**Status of  
Revisions to Regulatory  
Guides 1.52 and 1.140 and  
Generic Letter 99-02**

John P. Segala

U.S. Nuclear Regulatory Commission

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**Status of Revisions to  
RGs 1.52 & 1.140**

- On 2/23/00, NEI sent letter to NRC recommending changes to RG 1.52.
- Draft RGs (DG-1102 & DG-1103) have been revised to include many of NEI's proposed changes.
- Draft RGs scheduled to be issued for public comment on 11/1/00.
- Final RGs scheduled to be issued 10/1/01.



**Major Changes to RG 1.52**

- Made consistent with GL 99-02.
- Referenced current industry codes and standards (ASME AG-1-1997, N511-??).
- Allowed use of alternatives to dioctyl phthalate (DOP) and Refrigerant-11.
- Changed frequency from 18 months to 24 months or once per refueling outage.
- Updated fire protection guidance.



**Major Changes to RG 1.52  
(Continued)**

- Clarified painting, fire, or chemical release (consistent with 9/11/97 letter to Entergy).
- Acknowledged plants with older designed systems.
- Referenced alternate source term Regulatory Guide 1.183.
- Updated testing of new carbon.
- Referenced carbon sampling methods.



## NEI Proposed Changes Not Adopted

- For new charcoal:
  - Eliminate homogenized mixing,
  - Eliminate limitation on impregnant,
  - Eliminate radiation stability, and
  - Change maximum batch size to 500 ft<sup>2</sup>.
- Change heater test from 10 hours per month to 15 minutes per quarter)
- Eliminate the exclusion from use of silicone sealants on ductwork.



## NEI Proposed Changes Not Adopted (Continued)

- Allow increase in bypass leakage for in-place charcoal testing per GL 83-13.
- Revise bypass leakage to include a safety factor of 2.
- Address charcoal filters < 2 inches.
- Allow more credit for charcoal filters > 4 inches.
- Include separate test for elemental iodine.



## Status of GL 99-02

- Categorization of 104 Units:
  - ~38% in Group 1
  - ~62% in Groups 2, 3, or 4
- TS Amendments (65 Units):
  - 50% have been issued
  - 36% currently under review
  - 14% will be reviewed in FY-01