Enclosure 2
Staff Responses to Public Comments on Draft Regulatory Guide DG-1158
(Proposed Revision 1 of Regulatory Guide 1.57)

Comments			NRC Comment Resolution
Originator	**DG-1158 Section**	**Specific Comments**	
Nuclear Energy Institute 12/12/2006 cover letter (ML063560025)	B	The first paragraph mentions AP-1000 and CE 80+. ABWR and ESBWR are also advanced reactors in which the containment metal components not backed by concrete follow ASME NE rules, and they should be mentioned. Proposed Alternative: Add ABWR and ESBWR.	In this paragraph, the staff will cite AP-1000 and ESBWR as examples. The staff will copy the words from DG-1159 so that the last sentence of the paragraph reads as follows: "The provisions of this guide may be used for the current light-water reactors, as well as future advanced reactors, such as the Advanced Pressurized-Water Reactor (AP-1000) and the Economic Simplified Boiling-Water Reactor (ESBWR)."
	C.1.1	Descriptions for P_{g1}, P_{g2}, and P_{g3} are not exactly the same as those in DG-1159. Proposed Alternative: Use consistent descriptions for P_{g1}, P_{g2}, and P_{g3} in DG-1158 and DG-1159.	The staff will use the following definitions: P_{g1}: Pressure resulting from an accident that releases hydrogen generated from 100% fuel clad metal-water reaction P_{g2}: Pressure resulting from uncontrolled hydrogen burning P_{g3}: Pressure resulting from postaccident inerting, assuming carbon dioxide is the inerting agent
	C.1.1	Requirements for loads and load combinations associated with P_{g1}, P_{g2}, and P_{g3} appear related to Regulatory Position C.5 of RG 1.7, Revision 3. A cross reference would be helpful for a better understanding of the requirements. Proposed Alternative: Add RG 1.7, Revision 3, to the references.	The staff will add RG 1.7 to the reference section as follows: Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment," Revision 3, U.S. Nuclear Regulatory Commission, Washington, DC, September 2006, available in ADAMS under Accession No. 062560128. The staff will also add the following sentence at the end of Section C.1.1: "See Regulatory Guide 1.7 for additional guidance about the pressure load P_{g3} due to combustible gas concentration."
	C.1.2.3.1 (6)	The description "pressure test load" could lead to misinterpretation that test be conducted for P_{g3} pressure. The basis for 1.1 load factor is not clear. In DG-1159, C.5.A (2), P_{g3} is not required to increase by 10%. Proposed Alternative: Remove "test" from description. Delete load factor 1.1.	These provisions are addressed in 10 CFR 50.34(f)(3)(v)(B)(1) and (2). The staff recommends no change.

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	C.1.2.3.1 (5) and (6)	P_{g3} is defined to be pressure load from postaccident inerting, assuming carbon dioxide is the inerting agent. Since it is associated with postaccident conditions, Service Level C would be more appropriate than Service Level A as proposed. Proposed Alternative: Move items (5) and (6) to C.1.2.3.3.	The regulations in 10 CFR 50.34(f)(3)(v)(B)(1) clearly state that Service Level A Limits apply to both load combinations, items (5) and (6). The staff recommends no change.
	C.1.2.3.3 (4) and (5)	Regulatory Position C.5 of RG 1.7, Revision 3, does not require stability evaluation for these load combinations. Proposed Alternative: Add "evaluation of instability is not required" to items (4) and (5).	The regulations in 10 CFR 50.34(f)(3)(v)(A)(1) note that "evaluation of instability is not required." The staff agrees to add the phrase "evaluation of instability is not required" in both load combinations, items (4) and (5).