

May 14, 2010

Dr. Said Abdel-Khalik, Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
LETTER DATED MARCH 29, 2010, ON DRAFT FINAL REVISION 1 OF  
REGULATORY GUIDE 1.62, "MANUAL INITIATION OF PROTECTIVE ACTIONS"

Dear Dr. Abdel-Khalik:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated March 29, 2010, regarding recommendations of the Advisory Committee on Reactor Safeguards (ACRS) on the Draft Final Revision 1 of Regulatory Guide (RG) 1.62, "Manual Initiation of Protective Actions." The NRC staff and I agree with the recommendations in your letter as discussed below.

#### ACRS Recommendation 1

Revision 1 of RG 1.62 should not be issued as final until Recommendations 2 and 3 are addressed.

#### NRC Response

The NRC staff agrees.

#### ACRS Recommendation 2

Revision 1 of RG 1.62 should be revised to specify that, in addition to the considerations specified in Section 4.5.2 of the Institute of Electrical and Electronics Engineers Standard 603-1991 (IEEE 603-1991), protective actions initiated solely by manual controls are subject to consideration of (1) the time required for the operator to analyze and manually respond to an adverse conditions and (2) the time available for actions to be taken to mitigate adverse plant conditions.

#### NRC Response

The NRC staff agrees and will add to the Discussion section of RG 1.62 to specify the above two time considerations for permitting initiation or subsequent control by solely manual means.

#### ACRS Recommendation 3

Revision 1 of RG 1.62 should be revised to state explicitly that a system level actuation of all divisions which meets the requirements of IEEE 603-1991 is acceptable.

S. Abdel-Khalik

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NRC Response

The NRC staff agrees. The method for system-level actuation of all divisions will be added to the Discussion section of Revision 1 of RG 1.62.

The NRC staff and I appreciate the comments and recommendations provided by the ACRS. We look forward to continue work with the Committee as the staff evaluates future updates to RG 1.62.

Sincerely,

*/RA/*

R. W. Borchardt  
Executive Director  
for Operations

cc: Chairman Jaczko  
Commissioner Svinicki  
Commissioner Apostolakis  
Commissioner Magwood  
Commissioner Ostendorff  
SECY

