

## Response to Comments - SRP Abstract, Introduction, Glossary, Acronyms and Abbreviations

Comment No.	Source	Comment	Disposition
Ab-1	NEI	First sentence of second paragraph should be modified to clarify that the ISA is not part of the license application.	Agree in part. Abstract will be clarified.
Ab-2	NRC	Last full line second paragraph needs clarification	Will change "...will provide the basis for..." to "...will provide the primary basis for...pertinent NRC criteria..."
Int-1	NEI	Should clearly differentiate between the ISA and ISA Summary and explain how each is to be used	This will be done as appropriate.
Int-2	NEI	Should explicitly state that listed acceptance criteria are for higher-risk accident sequences and not necessarily appropriate for all accident sequences assessed in ISA.	Text will be added to indicate that acceptance criteria related to IROFS identified in the ISA summary are those for high risk sequences..
Int-3	NEI	Reviewer should be told to focus on examination of performance indicators rather than on specific details of how a performance goal will be achieved.	No change planned. To meet a "reasonable assurance" standard, NRC review of applicant's Safety Program Description must include an examination of how the applicant proposes to achieve the performance requirements of 70.61, and other parts of the rule.
Int-4	NEI	Use of "reasonable assurance" terminology should be extended throughout the SRP.	This will be done as appropriate.

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Int-5	NEI	Shorten some sections, relegate detailed information on acceptance criteria to individual chapters	Agree in part. Information on acceptance criteria in the Introduction is generally generic to all chapters. Some revision will be made to either delete or move some discussion to the ISA Chapter.
Int-6	NEI	Use terms consistently, make correct reference to defined terms, delete confusing and incorrect references to ISA and ISA Summary, delete from Glossary terms no longer used in rule or SRP, add terms where definitions may be important to the reviewer.	This will be done.
Int-7	NEI	Provided proposed rewrite with extensive revision	Accept some revisions in the final proposed version, consistent with general comment dispositions above.
GI-1	NRC	Definitions already in 70.4 should not be repeated in the SRP Glossary.	Agree. Terms included in the SRP Glossary that are defined in 70.4 will be referenced to that section.
GI-2	NEI	Suggest that “controlled area” and “defense in depth” should be in Glossary.	Agree. The terms “controlled area” and “defense in depth” will be included in the glossary.
GI-3	NRC	Modify definition of “active engineered controls”	Agree. Will modify to clarify the nature of the “response” provided by an active sensor. Replace first sentence with “Controls that use active sensors to determine values of controlled parameters and automatically <i>initiate</i> a response <i>intended to</i>

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			<i>regulate a process or device."</i>
GI-4	NRC	Modify definition of "accident sequence" to clarify that, by definition, sequence has a defined consequence that is arrived at with some (controlled) likelihood.	Modify to delete last clause in second sentence, "or if the accident has..."
GI-5	NEI	Suggest that a definition of the broader term "administrative control" be provided, with clarification of the two types of administrative controls	Agree in part. Administrative control will be defined as a human action. An "assisted administrative control" will be defined as one that uses a warning device to notify the human that intervention is necessary.
GI-6	NEI	Suggest modifying definition of Baseline Design Criteria to delete "and assurance measures" and add "for new facilities"	Agree in part. Will add "for new facilities and new processes" to last sentence. Will delete "assurance measures and add "management measures" because such are part of the Baseline Design Criteria.
GI-7	NEI	Comment that the definition of Configuration Management should identify it as a management measure.	Agree. Definition will be modified appropriately.
GI-8	NEI	Comment that the definition of "control" could be eliminated.	Agree. Will define only "safety control".
GI-9	NEI	Regarding the definition of "consequences of concern", suggest that specific parts of 70.61 be	Agree. Will specify paragraphs 70.61 (b), or (c)..

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		referenced.	
GI-10	NEI	Comment that definition of “credible event” needs clarification and should be non-quantitative.	Definition will be clarified, will have a quantitative basis as explained in Chapter 3, section 3.4.3.2, item 9
GI-11	NEI	Comment that definition of critical mass of SNM does not match that in 70.4.	The term will be referenced to 70.4 for definition.
GI-12	NEI	Definition of “deviation from safe operating condition” is not correct.	The definition will be modified for accuracy and clarity.
GI-13	NEI	Suggest minor changes to three definitions involving double contingency, and suggest deleting one of these terms as redundant..	Will clarify the definition of “double contingency principle”, and delete the terms “double contingency” and “double contingency protection”
GI-14	NEI	Definition of “integrated safety analysis” does not match 70.4.	Will reference the term to the definition in 70.4.
GI-15	NEI	Definition of “integrated safety analysis summary” does not match 70.4	Will reference the term to the definition in 70.4.
GI-16	NEI	Definition of “item relied on for safety” does not match 70.4.	Will reference the term to the definition in 70.4.
GI-17	NEI	Definition of “management measures” does not match 70.4.	Will reference the term to the definition in 70.4.
GI-18	NEI	Remove the term “Preliminary PHA” because the	Agree. Will define “Process Hazards Analysis”

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		proposed rule no longer requires a Preliminary PHA.	which is used in the SRP.
GI-19	NEI	Delete from the definition of "Preventive control" the phrase "of any magnitude"	Agree. Will delete the phrase.
GI-20	NEI	Modify definition of "Safety control"	Agree. Will substantially modify the definition to show that safety control has broader applicability and includes IROFS as a subset. This definition will, as suggested, include the previous term "control."
GI-21	NRC	Modify the term "simple-administrative controls" and its definition.	No need to create the term modified by "simple". Will define "administrative control" as "a control that is a human action necessary to prevent or interrupt the course of an accident sequence."
GI-22	NEI	Definition of "unacceptable performance deficiencies" does not match that in 70.4.	Will reference the term to the definition in 70.4.
GI-23	NRC	Eliminate the terms "Uncontrolled outcome" and "Unmitigated consequences" from the Glossary.	Agree. These terms are not used in the SRP. These terms are defined adequately in Chapter 3, the only place they are used.
Acro-24	NEI	Need to make language consistent - "Integrated Safety Assessment" is shown in list - will NRC use "assessment" or "analysis"?	Will change list to show "Integrated Safety Analysis" consistent with proposed rule language.