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February 10, 2005

Rules and Directives Branch
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Subject: Extension to Comment Period for Draft Guide DG-1130

Dear Sir or Madam:

The purpose of this letter is to request a 30-day extension of the public comment period for Draft Guide DG-1130; specifically, an extension until March 14, 2005.

A review of the draft material has indicated the need for additional time to comment on the specific guidance provided by the staff concerning computer based safety system security in Regulatory Positions 2.1 through 2.9. Specific discussions within the IEEE Nuclear Power Engineering Committee (NPEC) have included the following items related to this topic:

- Relevant Scope - The extensive material provided by the staff in section 2 of DG-1130 was not part of IEEE Std. 7-4.3.2-2003. However, this topic was recognized within the introduction of the standard as a needed addition. The NPEC Working Group responsible for this standard will be seeking an IEEE Project Authorization Request (PAR) to explore and structure this topic on an expedited basis.
Complexity of Topics - The material as presented in DG-1130 is based solely upon a life-cycle approach. Other approaches, including risk-based, are available to address safety system security. These other approaches will be examined by NPEC as part of the scope of the IEEE PAR.
Scope of the Security Topic in General - Discussions have indicated the topics of system safety and security encompass more than digital safety systems and may possibly be addressed more appropriately by a separate standard, which could be endorsed by another Regulatory Guide.

Specifically, the 30-day extension is requested to consolidate comments related to the above topics and to recommend specific wording changes for the Regulatory Guide.

Very truly yours,

[Handwritten signature of John J. Disosway]

John J. Disosway
Chairman
Nuclear Power Engineering Committee

RJB received
2/11/05

12/16/04

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E-RTDS = ADM-03

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SSSP Review Complete

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