

RDB received 3/16/05

gj

The current proposed guidelines as provided in DRAFT REGULATORY GUIDE DG-1130 (Proposed Revision 2 of Regulatory Guide 1.152) - CRITERIA FOR USE OF COMPUTERS IN SAFETY SYSTEMS OF NUCLEAR POWER PLANTS - while moving in the right direction does not go far enough. Considering that digital systems placed in critical path control functions of nuclear plants have the potential for such extreme abuse, the stated regulations indicating "should" instead of "must" are inadequate to meet the need of the public interest. While many in industry may fight against the increased requirement for assurance in these systems, their views cannot be allowed to dominate the well being of the general public that these regulations are intended to serve. For systems with high risk factors, sound change control, high assurance designs, life-cycle coverage, separation from any external communications, and many other similar protective measures should be mandated without exemption or exception. The notion that such widely known and accepted protection approaches should be optional is laughable. The notion of putting public safety at risk at the option of the people who stand to profit from doing the job less thoroughly than would be acceptable for similar protective systems used in drug manufacturing, food production, chemical plants, or other similar systems is outrageous. Sound information protection practices should be mandatory and enormous fines and jail time should be associated with anything less for safety critical systems. If we can send CEOs to jail for failure to protect financial records properly, we should be able to send safety system CEOs to jail for failure to the safety of the public.

FC

Fred Cohen
572 Leona Drive
Livermore CA 94550

12/16/04

69 FR 45359

11

SIS Review Complete

Template = ADM-013

E-RIDS = ADM-03
Call = S. Aggarwal (SKA)