



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

October 12, 2005

Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON DRAFT GUIDE (DG)-1128 - PROPOSED REVISION 4 TO REGULATORY GUIDE (RG)1.97, "CRITERIA FOR ACCIDENT MONITORING INSTRUMENTATION FOR NUCLEAR POWER PLANTS," (VOL. 70 FEDERAL REGISTER 49953, DATED AUGUST 25, 2005)

TVA appreciates the opportunity to comment on the subject draft guide. TVA offers the following comment:

Delete the applicability of Institute of Electrical and Electronic Engineers Standard (IEEE)-497 in Section B of the draft Revision 4 RG 1.97. This imposes excessive requirements on equipment defined as Type B and Type C Variables in the RG. The conflict is introduced by reference to IEEE 7-4.3.2 given by IEEE-497. In addition, the extra requirements conflict with Branch Technical Position No. HICB-19 referenced in the same DG section. Only Variable Type A equipment should apply to the requirement to demonstrate defense-in-depth against common-mode software failure. Specifically, HICB-19 focus is addressing common-mode software failures with respect to safety-related protective functions (i.e., the Reactor Protection System and the Engineered Safeguard Feature Actuation Systems), and should not be applied beyond Post Accident Monitoring Type A instrumentation needed for manual protective actions.

If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

Glenn W. Morris  
Manager, Corporate Nuclear Licensing  
and Industry Affairs

cc: U.S. Nuclear Regulatory Commission  
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STSP Review Complete

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