

April 20, 2006

Dr. Graham B. Wallis, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: DRAFT FINAL REVISION 4 TO REGULATORY GUIDE 1.97,
"CRITERIA FOR ACCIDENT MONITORING INSTRUMENTATION
FOR NUCLEAR POWER PLANTS"

Dear Dr. Wallis:

I am responding to your letter, dated March 28, 2006 (ADAMS Accession #ML060870349), concerning the draft final Revision 4 of Regulatory Guide 1.97, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants" (hereinafter "Rev. 4"). In that letter, you presented feedback and recommendations from the Advisory Committee on Reactor Safeguards (ACRS or the Committee), based on the Committee's in-depth review of the guide and consideration of the related formal presentation by staff from the Office of Nuclear Regulatory Research (RES) on March 10, 2006. We appreciate the time and effort ACRS devoted to reviewing this guide.

As you know, the revised guide describes a new method for selecting and applying criteria to accident monitoring instrumentation, and is intended for new nuclear power plants. Nonetheless, your letter conveyed the Committee's recommendation that the U.S. Nuclear Regulatory Commission (NRC) should not issue Rev. 4 in its present form. In particular, the Committee recommended that "The staff should revise Regulatory Position 1 to allow licensees to adopt the IEEE 497-2002 Standard to modify individual accident monitoring instruments without a complete analysis of all accident monitoring instrumentation." Further, the Committee agreed with the staff's position "that licensees should not be allowed to use the IEEE 497-2002 Standard to eliminate or reclassify accident monitoring instrumentation required by previous editions of this Standard unless Revision 4 to Regulatory Guide 1.97 is adopted in its entirety."

On April 5, 2006, the staff discussed the ACRS recommendations with Drs. Sieber, Bonaca and Maynard to obtain further clarification of the Committee's comments. On the basis of that clarification, the staff proposes to modify Regulatory Position 1 to provide additional guidance to current operating reactor licensees with regard to performing modifications to accident monitoring instrumentation. Specifically, the staff's proposed changes to the draft final guide include removing the previous guidance regarding partial conversions from Regulatory Position 1 and adding the following new guidance regarding modifications:

If a current operating reactor licensee voluntarily uses the criteria in Revision 4 of this guide to perform modifications that do not involve a conversion, the licensee should first perform an analysis to determine the complete list of accident monitoring variables and their associated types in accordance with the selection criteria in Revision 4.

Such an analysis will provide the licensee with the information needed to review the basis for proposed modifications, its impact on any other post accident monitoring instrumentation and to ensure that the accident monitoring instrumentation requirements for the subject nuclear power plant remain satisfied.

The staff's resolution to the ACRS recommendations provides additional flexibility for licensees of current operating reactors to perform modifications to accident monitoring instrumentation based on Rev. 4 criteria. This change will enable licensees who desire to upgrade a portion of their accident monitoring variables to adopt Rev. 4 for the applicable instrumentation without the unnecessary regulatory burden of converting all variables to all Rev. 4 criteria. The enclosed draft final Revision 4 of Regulatory Guide 1.97 incorporates this proposed resolution.

Also, as stated during the staff's presentation to ACRS on March 10, 2006, this guide is intended for licensees of new nuclear power plants, and conversion to Rev. 4 by licensees of current operating reactors is strictly voluntary. These licensees have made licensing commitments to Rev. 2 or Rev. 3, both of which provide sound technical guidance for the current fleet of light-water reactors. There is no regulatory requirement, incentive, or motivation for licensees to convert to Rev. 4 or to perform modifications in accordance with Rev. 4.

If you have any technical questions on this proposed resolution, please feel free to contact Mr. William E. Kemper at (301) 415-7585 or WEK@nrc.gov.

Sincerely,

/RA Michael Weber Acting for/

Luis A. Reyes
Executive Director
for Operations

Enclosures:

- (1) Final Revision 4 of Regulatory Guide 1.97
- (2) IEEE Std. 497-2002

cc w/enclosures: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko
Commissioner Lyons
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/RA Michael Weber Acting for/

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EDO#: G20060338 RES#: 2006214

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OAR in ADAMS? (Y or N) Y ADAMS ACCESSION NO: **Pkg.ML 061080029** TEMPLATE NO. EDO-002

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