



NUCLEAR ENERGY INSTITUTE

James H. Riley
DIRECTOR, ENGINEERING
NUCLEAR GENERATION DIVISION

February 9, 2007

Mr. Allen Howe
Branch Chief, Instrumentation & Controls
Nuclear Regulatory Commission
Mail Stop T 9C-24
Washington, DC 20555

Subject: Comments on Branch Technical Position 7-19, Guidance for Evaluation of Diversity and Defense-in-Depth in Digital Computer-Based Instrumentation and Control Systems

Project Number: 689

Dear Mr. Howe:

The Nuclear Energy Institute (NEI) has reviewed a draft of Branch Technical Position 7-19 (SRP BTP 7-19, Rev. 5, January 2007).

In the description of changes to draft BTP 7-19, the staff states that this SRP section has been updated administratively in accordance with NRR Office Instruction, LIC-200 Revision 1, "Standard Review Plan (SRP) Processes." Our review of the draft SRP indicates that there are several changes that are not administrative, but are technical in nature. The changes in question include:

- Removal of leakage detection as justification for specific vulnerabilities not addressed by alternate trip, initiation or mitigation capabilities.
- Reference to common cause logic failures as single failures.
- Application of BTP 7-19 Point 4 (displays and controls for manual system actuation) to operating plants.

In accordance with NRR Office Instruction LIC-200, technical changes require a regulatory analysis to be performed in accordance with NRR Office Instruction LIC-400, "Control and Review of Generic Requirements", as well as public comment and approval by the Director of NRR, the CRGR and the Executive Director of Operations. Given the schedule for issuing the administrative revisions to BTP 7-19, there does not appear to be time to complete this process. Therefore, we suggest retaining the current wording as found in the June 1997 version of this section to the SRP for each of these

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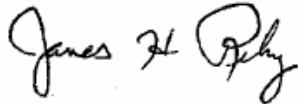
issues. These changes can be addressed by the Task Work Group on Diversity and Defense-in-Depth in order for the staff to obtain industry input to the required regulatory analyses.

The enclosure provides additional comments and recommendations related to BTP 7-19.

There are other issues associated with BTP 7-19 that should be resolved to provide improved guidance on Diversity and Defense-in-Depth evaluations for digital instrumentation and control (I&C) systems. The NEI Digital I&C and Human Factors Working Group discussed some of these issues with NRC during a public meeting on February 2, 2007. NEI is working with NRC to resolve these issues.

We appreciate the opportunity to review and comment on BTP 7-19. If you have any questions regarding this effort, please contact Kimberly Keithline at (202) 739-8105; kak@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Riley". The signature is fluid and cursive, with the first name "James" and last name "Riley" being clearly legible, and "H." in the middle.

James H. Riley

Enclosure

C: Mr. John A. Grobe, Associate Director, Engineering and Safety Systems, NRC
Mr. Patrick L. Hiland, Director, Division of Engineering, NRC
Ms. Tonya M. Mensah, Sr. Project Manager, NRC