



Alexander Marion
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NUCLEAR GENERATION DIVISION

February 7, 2007

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

Subject: Comments on Standard Review Plan, Appendix 7.1-D

Project Number: 689

Dear Mr. Howe:

The Nuclear Energy Institute (NEI) has reviewed draft sections of the Standard Review Plan Appendix 7.1-D, which are included as an enclosure to this letter. This was distributed at the public meeting on February 2, 2007.

The following change is recommended to the fourth paragraph, second sentence of section 5.6 to allow non-safety operator workstations that control safety-related equipment:

"The portion of the safety software which actually performs the safety function, i.e., determining whether or not to trip based on sensor inputs, *shall* not receive input from any non-safety system *that could prevent or adversely influence the safety function* while the safety system is on –line and performing that safety function."

In addition, there are other issues associated with Appendix 7.1-D, IEEE Standard 7-4.3.2, and Regulatory Guide 1.152 that should be resolved to provide improved guidance on digital system communication and independence. The NEI Digital Instrumentation & Control (I&C) and Human Factors Working Group identified these issues during public meetings with NRC on October 19 and December 12, 2006. NEI is working with the NRC to resolve these issues during the next few months.

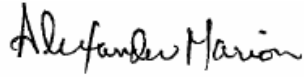
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We appreciate the opportunity to review and comment on the draft documents. If you have any questions regarding this effort, please contact Kimberly Keithline at (202) 739-8105; kak@nei.org.

Sincerely,

A handwritten signature in black ink that reads "Alexander Marion". The signature is written in a cursive style with a large, stylized 'A' and 'M'.

Alexander Marion

Enclosure

c: Mr. John A. Grobe, Associate Director, Engineering and Safety Systems, NRC
Mr. Patrick L. Hiland, Director, Division of Engineering, NRC