



NUCLEAR ENERGY INSTITUTE

**James H. Riley**  
DIRECTOR  
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NUCLEAR GENERATION DIVISION

December 21, 2007

Mr. Michael L. Marshall, Jr.  
Chief, Technical Specification Branch  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
Mail Stop T-7 F3  
Washington, DC 20555-0001

**Subject:** EPRI Report 1015089, "Minimum Inventory of Human System Interfaces"

**Project Number: 689**

Dear Mr. Marshall:

Enclosed is the subject EPRI report on minimum inventory of human system interfaces for your review and comment. This document formalizes the information that was shared on this topic with the NRC staff at the November 13, 2007 public meeting on Digital Instrumentation and Controls Human Factors. The industry believes that this document describes an acceptable approach for determining the minimum inventory for human system interfaces. We look forward to meeting with your staff in February to discuss the minimum inventory report and your comments.

We believe any NRC staff review of the enclosed report is exempt from the fee recovery provision contained in 10 CFR Part 170. This submittal provides information that was requested by the NRC as part of the industry / NRC effort to establish guidance for digital Instrumentation and Controls upgrades and may be helpful to NRC staff when evaluating licensee submittals provided to upgrade instrumentation and control systems to digital technology. Such reviews are exempted under §170.11, Exemptions, Subpart (a) (1) (iii). This provision states, (a) "No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for...(1) A special project that is a request/report submitted to the NRC--(iii) As a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts".

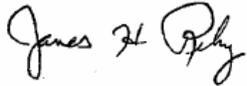
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If you have any questions on this letter or its enclosure, please contact me at (202) 739-8137; [jhr@nei.org](mailto:jhr@nei.org) or Russell Smith at (202) 739-8058; [ras@nei.org](mailto:ras@nei.org).

Sincerely,

A handwritten signature in cursive script that reads "James H. Riley". The signature is written in black ink and is positioned above the printed name.

James H. Riley

Enclosure

c: Mr. Julius J. Persensky, U.S. Nuclear Regulatory Commission  
Mr. James P. Bongarra, U.S. Nuclear Regulatory Commission  
NRC Document Control Desk