

U.S. Nuclear Regulatory Commission
 Digital Instrumentation and Controls Project Plan Revision
 NEI Comment/Resolution

NEI COMMENT	COMMENT/ RESOLUTION
TWG 2	
Long Term, Evaluation of Digital Systems Operating Experience Insights	
Add: Industry provide white paper on evaluation of operating experience (OE) - 2/28/08 (It might be possible to move this up to end of January if we can get an expeditious review by the NEI D3 Task Force)	Accepted Used Forecast Date of 01/31/08
Add: NRC provide review comments on the industry OE evaluation white paper - TBD	Not Accepted
Add: Industry provide revised white paper on evaluation of OE - TBD + 1 month	Not Accepted
Long Term Problem 1 Adequate Diversity	
It appears that NRC plans to issue a NUREG based on the ORNL work before industry has a chance to review and comment on it. Also, there is no Plan item for NRC to provide review comments on industry input.	n/a
Add: Industry provide comments on ORNL report - 7/30/08	Not Accepted – Added Discussion of Report in Public Meeting With a Forecast Date of 03/31/08
Add: Delay NUREG for ORNL report so that it can reflect industry input, perhaps to 9/30/08	Estimated Publication Date of NUREG changed to 01/15/09
Add: Industry provide white paper on integrated diversity/defensive measures approach (the one that is on the list now) - 9/30/08 (three months after industry receives the ORNL report)	Not Accepted Added White Paper Date of 04/15/08
Add: NRC provide review comments on the industry D3 white paper - TBD	Not Accepted
Add: Industry provide final D3 white paper - TBD (could substitute EPRI report for industry white paper if appropriate)	Not Accepted
Add: NRC provides review/endorsement of final industry D3 white paper/report - TBD	Not Accepted
Long Term Problem 3 - BTP-19 Position 4 Challenges	
This is missing from the schedule, but we know that NRC is preparing an update to the ISG.	Accepted, Problem 3 Added, but ISG Will not be Revised SRP Will be Revised
Add: That update should be added to the schedule, with industry feedback (as listed), a response to the update.	Not Accepted See Above
Long Term Problem 4 - Effects of Common-Cause Failure	
NRC is currently revising the ISG language here. That should be added to the schedule, with industry feedback (as listed), a response to the update.	Not Accepted ISGs are not going to be revised

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Long Term Problem 5 - CCF Applicability		
	Recommend expanding the list to address all the likely steps	n/a
	Industry to Provide White Paper on Common Cause Failure Applicability (the one that's in the plan now) - 2/28/08 (It might be possible to move this up to end of January if we can get an expeditious review by the NEI D3 Task Force)	Accepted Added Forecast Date of 02/29/08
	Add: NRC provide review comments on the industry D3 white paper - TBD	Not Accepted
	Add: Industry provide final CCF white paper - TBD (could substitute EPRI report for industry white paper if appropriate)	Not Accepted
	Add: NRC provides review/endorsement of final industry D3 white paper/report – TBD	Not Accepted
	Add: NRC update ISG to reflect industry white paper/report as appropriate – TBD	Not Accepted
Long Term Problem 6 - Echelons of Defense		
	Add: Industry to Provide Feedback to ISG (the one that's in the plan now) - 1/31/08	Accepted Added Forecast Date of 01/31/08
	Add: NRC update ISG to reflect industry feedback - TBD	Not Accepted ISGs are not going to be revised
General Comments		
	Develop and Issue Revisions to SRP Chapter 7 Schedule should be adjusted as needed to ensure that there is time to factor industry feedback into revisions. Treatment of Problem 1 (Adequate Diversity) may be problematic here.	Schedule reflects normal timelines for issuance/revision of regulatory/guidance documents
	As a general comment, it would be good if somewhere the plan called attention to the need for regulatory analyses for new NRC positions, changes to the SRP, and such. This should be added to make it clear to everyone that the regulatory analyses will be needed before the SRP can be revised.	Schedule reflects normal timelines for issuance/revision of regulatory/guidance documents including time for regulatory analysis if necessary
	It is not clear that the proposed schedule in the Project Plan reflects the steps necessary to modify the SRP or other generic regulatory guidance documents that may be changed.	Schedule reflects normal timelines for issuance/revision of regulatory/guidance documents

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	LIC-200 (Detailed Procedures for Updating a SRP Section) requires the staff to identify any changes that are new staff positions. The definition of a new staff position is any change to the SRP that is not administrative and has not received public comment, approved by the Director of NRR, the CRGR, and EDO. As the ISGs were intended to streamline the licensing reviews, the ISG process did not result in the necessary reviews and a regulatory analysis in accordance with LIC-400 (Control and Review of Generic Requirements) will be necessary for each ISG that is incorporated into the SRP. It may be that several licensees may volunteer to comply with the ISGs as a part of near term licensing activities; however, the voluntary nature of the ISGs should not be a rationale for bypassing existing regulatory processes that govern the development of regulatory requirements.	Existing NRC processes will be used to develop/revise requirements/guidance documents as necessary Not all process actions are included in the schedule
	With respect to the D-3 ISG, regulatory analyses would appear to be required to incorporate the guidance for all but Problem Statements 6 and 7 (which simply reiterate long standing regulatory positions and require no changes to the SRP). It would be worthwhile to note the development of the required regulatory analyses in the Plan.	Schedule reflects normal timelines for issuance/revision of regulatory/guidance documents including time for regulatory analysis if necessary Not all process actions are included in the schedule
TWG 3		
	Near Term Problem 2: Risk Insights from DI&C PRA modeling Applied to Operating Reactors or New Reactors	
	Most notably, Industry proposes accelerating the industry implementation of a proposed pilot plant project by two months. The industry is hoping for a corresponding acceleration of the schedule from the NRC, as we are of the opinion that the pilot plant needs to move along rapidly to be effective.	
	Add: Industry provides risk-insights for selected ISGs and proposes changes to current regulatory guidance reflecting these insights. Forecast Date: 2/28/2008	Accepted
	Add: NRC review and comment on industry assessment of selected ISGs and proposed changes to regulatory guidance. Forecast Date: 03/28/08	Accepted
	Change Forecast Date from 04/28/08 to 01/18/08 for Industry to identify potential review areas where insights from PRA modeling of DI&C systems may be applied to risk-inform staff reviews (e.g., Technical Specifications, BTP-7-19 reviews)	Accepted
	Change Forecast Date from 05/30/08 to 03/30/08 for Industry to propose pilot plant application and pilot charter consistent with treatment of other risk-informed initiatives (e.g., Tech Spec 4.b initiative)	Accepted

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TWG 6		
Section 1		
	Second paragraph still refers to fuel cycle facilities incorrectly. TWG#7 is covering these facilities.	Accepted Deleted References to Fuel Cycle Facilities
	Items 1A and 1B seem to be written to apply to COL Applicants only. These need to be revised to cover operating plant LARs as well as COLAs.	Partially Accepted - Clarified Plan such that TWG #6 Activities are for Operating Plants only
Section 3		
	Problem 2 still refers to fuel cycle facilities and it too should be revised.	Accepted Deleted References to Fuel Cycle Facilities
Section 5		
	The NEI White Paper can be provided now but is likely to be out of date based on what has happened in the past few months. Industry would rather wait to provide it, after the draft ISG is issued.	Accepted But NRC Requests Copy of White Paper Now in Whatever Stage it is in
	When the DI&C SC met on 20Oct07, it was pretty clear that TWG#6 applied only to Part 50 LAR applications. Are we seeing that it will now cover both Part 50 and 52 applications?	No