



NUCLEAR ENERGY INSTITUTE

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January 4, 2007

Mr. Michael Franovich
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry comments on NRC's draft "Review of New Reactor Digital Instrumentation and Control Probabilistic Risk Assessments"

Project Number: 689

Dear Mr. Franovich:

Enclosed are industry comments on NRC's draft Interim Staff Guidance (ISG) "Review of New Reactor Digital Instrumentation and Control Probabilistic Risk Assessments," dated November 29, 2007. Attachment 1 contains general comments on the document; Attachment 2 contains specific comments.

A review of the document reveals numerous instances in which the staff addressed industry comments on their November 5, 2007 whitepaper on this subject. There are frequent references to the ability to derive insights from PRAs with respect to I&C designs. The industry appreciates the staff's efforts in incorporating these insights and comments, and also appreciates the opportunity to comment on the current draft of the document.

With the current state of progress on this ISG, the industry considers the work on Problem Statement #1 for the Risk Informing Task Working Group to be nearing completion, and we believe that the efforts of both the NRC and the industry are best focused on Problem Statement #2 in the coming months. We look forward to completing the work associated with Problem Statement #1 and pursuing an accelerated schedule for Problem Statement #2.

Mr. Michael Franovich

January 4, 2008

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If you have any questions or require additional information, please contact me or Victoria Anderson (vka@nei.org; 202.739.8101).

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a large, stylized flourish that extends to the right and loops back under the name.

Biff Bradley

Enclosures

c: NRC Document Control Desk