

HLWYM NPEmails

From: Michael Waters
Sent: Friday, July 14, 2006 4:32 PM
To: Mahendra Shah; Rosemary Reeves
Cc: Amitava Ghosh; Biswajit Dasgupta; George Adams; Andy Campbell; Robert Johnson (NMSS); Christopher Ryder; Albert Wong
Subject: Re: Comments on the Draft ISG-02 PCSA

Mahendra,

I agree with proposed changes with 2 exceptions. I also have two additional comments myself.

(1) I don't understand the need to re-distinguish "prevent and mitigate" into "limit or prevent or mitigate" in those two passages. I guess I always interpreted that ability to "mitigate" to also include the ability to "limit" on general levels. Also note that the definition of Important to Safety in 63.2 states "to prevent or mitigate Category 2 events sequences." However, I'm not going to object to change if it is important.

(2) I'm negotiable on this one: I prefer to call it "level of design and operational" information simply because we often focus only on design information, and forget about the important context of how the design is used operationally. This is especially important for reliability estimates of active SSCs. This is the reason I recommended the two specific areas mentioned.

(3) The definition of "Design Criteria" in the glossary is non-sensical given the previous definition for Design Bases. One says functions to be performed, the other says functions to be accomplished. Recommend deleting definition, given it is not defined in the regulation, or use a more common-sense definition. Such as discrete physical parameters based on the design bases, in which the system must....

(4) The definition of "Risk-Informed" is vague and provides not benefit. In even the most deterministic regulations, we focus on activities and events that have a "noticeably large potential for an adverse outcome." Recommend deleting.

>>> Mahendra Shah 07/14/2006 2:01 PM >>>
Rosemary:

Attached please find my comments on the Main Body of the latest draft ISG-02, you had sent me earlier this week. Thanks. Have a good weekend.

Mahendra

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