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RULES AND DIRECTIVES
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Serial: PE&RAS-08-082
December 18, 2008

Chief, Rulemaking, Directives, and Editing Branch
Division of Administrative Services
Office of Administration
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on Draft NUREG/CR-XXXX "Modeling a Digital Feedwater Control System Using Traditional Probabilistic Risk Assessment Methods" 73FR67555 (November 14, 2008)

The Nuclear Regulatory Commission (NRC) has issued for public comment the subject draft NUREG. Progress Energy is pleased to submit the following comments.

1. The proposed NUREG does not discuss past and ongoing efforts to determine the reliability of digital systems in industries such as commercial aviation and in the space program where there are significant requirements in modeling reliability. It would be advantageous for the NRC to benchmark these industries and incorporate insights into the final NUREG.
2. The NRC should consider clarifying the NUREG to reflect that it is applicable to systems in new plants and complex systems in existing plants, but that single/standalone digital systems/components in existing plants are exempt from the requirements of the final NUREG. The proposed NUREG would require a significant amount of unnecessary analytical effort for existing plants that have single, isolated, or standalone digital components and/or systems.
3. The proposed NUREG would require complex analyses of the detailed inputs into the digital feedwater control system and their interactions. The present methodology does not require such an analysis of the current analog control system, which performs the same function. The NUREG should consider that there are a limited number of outcomes, that can be identified deterministically, which need to be evaluated. For example, in feedwater systems, without detailed component, subcomponent, and software modeling, it can be determined that the only outcomes that need to be evaluated are loss of feedwater to a steam generator(s), underfeeding a steam generator(s), or overfeeding a steam generator(s).

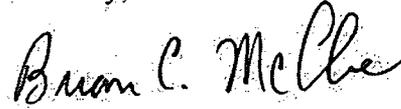
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Please contact Bob Rishel at (919) 546-2662 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Brian C. McCabe". The signature is written in a cursive style with a large, prominent "B" and "C".

Brian McCabe
Manager – Nuclear Regulatory Affairs

KMH