

NRCREP Resource

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From: Tim Hurst [timh@hursttech.com]
Sent: Thursday, February 19, 2009 2:23 PM
To: NRCREP Resource
Cc: jhr@nei.org; Jerry Mauck; Johnny Pinto; Kyle Dittman
Subject: DG-1190 Manual Initiation Comments

Hurst Technologies has the following comments against the subject draft RG:

1. General: The requirements as stipulated in the draft RG appear to be an attempt to move, what is currently a beyond design bases event (software common cause failure; SWCMF), to the level of a DBE and require full implementation of codes and standards previously not required for manual initiation. The issue of SCMF is already addressed in existing regulatory guidance and should not be included in this issue.
2. Interpretation of IEEE-603 Requirements: In Section B. Discussion, the descriptions of IEEE-603 requirements go beyond the specific requirements of the standard and add additional requirements with no real bases. Example, the requirement that manual control must meet the single failure criterion.
3. Section C Regulatory Position 1: This is a significant expansion of the current requirements and designs with no defined benefit or bases. The need is to have manual capability to support safety functions defined and not just because a piece of equipment is part of a system performing a safety function.
4. Section C Position 3: The requirement to have individual manual controls in the main control room far exceeds the safety need. The need for what and where manual controls should be part of the design and safety evaluation as generally defined by IEEE-603.
5. Section C position 5: To meet the requirements of system level actuation beyond the digital I&C requires an additional automatic type control system (either conventional or digital) this leads to then having a third level of individual controls and an even more complex design. Once again, the prescriptive requirements should not be added as IEEE-603 addresses this issue appropriately.
6. Regulatory Analysis The statement that this RG could lead to cost savings has no bases and based on our experience it will be a significant cost adder to current and new plants.

If you have any question on these comments I can be contacted at the number below or by email at: timh@hursttech.com

Thank you.

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*SUNSI Review Complete
Template = ADM-013*

*E-RIDS = ADM-03
1 Add = K.H. Nguyen (KHN)*