

NRCREP Resource

To: Mookhoek, William
Subject: RE: STP Comments Against DG-1190 on Manual Initiation

From: Mookhoek, William [mailto:wemookhoek@STPEGS.COM]
Sent: Monday, February 23, 2009 8:13 AM
To: NRCREP Resource
Cc: 'gac@nei.org'
Subject: STP Comments Against DG-1190 on Manual Initiation

Per the December 23, 2008 Federal Register notice, attached are STP Units 3 & 4 comments on DG-1190, Manual Initiation of Protective Actions.

Bill Mookhoek
Licensing Supervisor STP 3 & 4
wemookhoek@stpegs.com
office 361-972-7274

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SUNSI Review Complete
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Code = K.H. Nguyen (Khn)

DOCUMENT COMMENT RESOLUTION FORM

Document Title: NRC DG-1190

Review Date: 02/18/09

Comment No.	Document Section	Comment	Comment Resolution
1	A, p2; Para 4	Clause 6.2 (.3) of IEEE 603 requires (in part) that means be provided to implement manual actions necessary to maintain safe conditions ...these controls shall be located in areas that are accessible. It does not state specifically in the control room.	
2	B, p3, Para 1	A definition should be provided for advanced analog controls and why they are subject to new vulnerabilities.	
3	B, p3, Para 2	Clause 7.2 actually states in part that manual control should not defeat the single failure criterion. Component controls are part of a division/train and as such are not required to separately or individually meet the SF criterion.	
4	B, p3, Para 3	Not all component controls are required for completion of the safety function and the claim of increased reliability is questionable. IEEE 603 does not require this nor did the previous RG 1.62	
5	B, p3, Para 3	What is the reason for requiring a specific manual action time of 30 minutes. It is recognized that this is used for the D3 ISG and the reasoning was the unknowns associated with a SWCMF. The ANS standard is written differently with two distinct times for AOOs and DBAs.	
6	B, p4, Para 1	The statement is made that manual controls and indications consist of safety-related devices with safety-related software. Why is the NRC requiring this (software) for manual controls and indications..	

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7	B, p4, Para 2	The RG should not reference a RG with a particular revision. Most operating plants use Revision 3 of RG 1.97. IEEE 603 references an earlier version of IEEE 497. Operating plants are not licensed to the 2002 version.	
8	B, p4, Para 3	Why is this RG discussing beyond design basis events since IEEE 603 does not (1 st comment). The last four sentences of this paragraph should be removed.	
10	B, p4, Para 4	This comment is the same as above. The remainder of the paragraph starting with "Regulatory Guide 1.152" should be deleted.	
11	B, p4 & 5, Para 5	Discussing computer qualification and harsh environment is questionable for this RG. The qualification effort should be restricted unless the manual components are part of a computer-based system, which is usually not the case for simplicity and automatic failure reasons.	
12	B, p5, Para 1	Same as comment 10. This entire paragraph should be deleted. It is already covered in BTP 7-19 and the ISG.	
13	C, p5, Item 1	The requirement for manual component controls needs to be rewritten. It seems that NRC is requiring plant system component level controls for the completion of all safety functions and to increase reliability. This is beyond IEEE 603.	
14	C, p6, Item 3	The requirement for all component controls being in the control room is new and needs to be justified. IEEE 603 only requires those component controls necessary for safe shutdown action to be in the control room.	
15	C, p6,	Item 4 seems to require a priority	

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	Item 4	logic module such as a FPGA. This needs to be justified and explained. How is the manual actuation to be kept simple?	
16	Reg Analysis , p7, Para 1 and 2. Objective	The draft RG content goes beyond the purpose stated and formulates new positions not based on IEEE 603..	
17	Reg Analysis , p8, Para 1	The draft RG cites the benefit of enhancing reactor safety by endorsing the most current IEEE on safety systems endorsed by the NRC. The Draft RG goes beyond this endorsement.	
18	Reg Analysis , p8, Para 2 & 3	Does the NRC have actual numbers for the cost savings and where does the draft RG actually achieve this? Based on the high cost of any safety related system/equipment, the impact of this RG will be extremely high and not "cost affective".	