

## NRCREP Resource

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**Subject:** Comments on Draft Guide DG-1205

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(2)

GEH would like to provide the following comments on the DG-1205:

1. The draft guide states:

"Clause 5.8.3.3 of IEEE Std 603-1991 requires that, for indication of bypasses, "the capability shall exist in the control room to manually activate this display indication."

GEH would like to clarify the intent of this requirement. GEH believes the intent is to provide for manual bypass of a system and the display of the bypass condition. It would be undesirable for the display to indicate a bypass condition, if the bypass condition were not present in the system logic.

2. The draft guide also states:

Clause 5.16 of IEEE Std 338-1987 states that "indication should be provided in the control room if a portion of the safety system is inoperable or bypassed."

GEH would like to clarify that the intent of this paragraph is to provide indication that the system is in an off-normal condition (either inoperable or bypassed), and that the continuously available indication does not need to differentiate between inoperable and bypassed. Since the equipment will generally be in the normal condition, a requirement to display the inop and bypassed conditions separately provides an additional constraint on the HFE design process and may result in a less desirable configuration.

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