



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 21, 2010

MEMORANDUM TO: Lois M. James, Chief
Probabilistic Risk Assessment Op Support Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 24, 2010, CATEGORY 2 PUBLIC MEETING
REGARDING DEVELOPMENT OF INTERIM STAFF GUIDANCE ON
THE DIGITAL INSTRUMENTATION AND CONTROL SYSTEM
UPGRADE LICENSING PROCESS (ISG-6)

On March 24, 2010, the Nuclear Regulatory Commission (NRC) staff conducted a Category 2 public meeting to discuss the development of guidance for the staff in the Office of Nuclear Reactor Regulation regarding the licensing process for digital instrumentation & control (I&C) upgrades. A notice for this meeting was issued on February 16, 2010, and is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML093491083. The attendance sheet is included as Enclosure 1 to this memorandum.

The purpose of this meeting was to discuss the industry comments on the interim staff guidance and review NRC staff incorporation and resolution of the comments. No presentation slides were used for this meeting. The comments submitted by NEI are available under ADAMS Accession No. ML100780210.

The meeting was opened by a brief discussion of the current status of the document. In particular, it was identified that due to the volume and magnitude of comments received, the NRC was not currently able to disposition all comments. Additionally, two "parking lots" were used for comments and discussions that were not resolvable at the meeting. The first was for those issues that could be resolved within the development of ISG-6 and the second was for those that were not.

Prior to discussion of the individual comments, Bill Kemper, Chief of the Instrumentation and Controls Branch, provided opening remarks in which the general comments tendered by NEI were addressed. The following is a summary of his responses to the industry general comments.

The first general comment was that a large amount of information is required to be docketed in support of a review. It was reiterated that the purpose of ISG-6 is to define the existing licensing process. The NRC Staff reiterated that the level of documentation needed for the NRC staff to reach a decision is guided by Chapter 7 of the Standard Review Plan (SRP). Although the need for a revision to Chapter 7 of the SRP is being considered independent of the development of

ISG-6, it is not appropriate to implement such changes with the guidance. The NRC staff did offer to explore the feasibility of using available information-technology to more efficiently and effectively identify which information needs to be docketed. This activity, however, would only serve to add efficiency and effectiveness to docketing of the information that the NRC staff continues to need in reaching its safety conclusion.

The second general comment tendered by NEI was that the document requires non-proprietary versions of most documents. The NRC staff responded that the requirement to submit non-proprietary versions of documents requested to be withheld from the public docket is a requirement that exists for all licensing activities and is not negotiable within the scope of ISG-6. It was, however, acknowledged that this burden could be reduced by refinement of what documentation needed to be docketed. As an example, the use of the document utilization matrix from the Oconee Nuclear Station digital I&C upgrade was cited. In this case, the NRC staff is reviewing those documents referenced in the safety evaluation against those submitted to ensure that the NRC only requires docketing of those documents necessary to reach the safety conclusion.

The third general comment was that the draft fails to clarify what and when information is needed. The NRC staff agreed that the ISG should be as clear as possible with respect to this. Additionally, there are specific comments in the NEI comment matrix that address this issue.

The fourth general comment was that the draft unnecessarily repeats information available in other documents. The NRC staff has received opposing comments on this issue. Some comments have advocated including the information, while others have advocated simply referencing information. Without a clear bias of benefits or detriments from either choice, the NRC staff has included the information instead of referencing it. Unless a compelling argument is tendered for the need to change, the information will be included. Further, it was noted that this issue had been previously raised and resolved at multiple public meetings.

During the meeting, the comments were discussed and the content of the two parking lot boards are included as Enclosure 2 to this memorandum.

At the conclusion of these discussions, the meeting was opened for public comments. No public comments were received.

Please direct any inquiries to me at 301-415-2481, or ed.miller@nrc.gov.

/ra/

G. Edward Miller, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. List of Attendees
2. Parking Lot Content

Sign In Sheet	Draft ISG-6, "Digital I&C Licensing Process"
DATE: March 24, 2010	

Name	Organization
CARL A. VITALBO	WESTINGHOUSE ELECTRIC CO
Scott Patterson	Pacific Gas + Electric Co.
Gregg Clackson	Wolf Creek Nuclear Operating Corp
Bob Hirmanpow	NuStart
Daniel Santos	U.S. NRC
BILL KEMPER	NRC/NRR/DE/EICB
Tom Bergman	NRC/NRO/DE
RAYMOND DiSANDRO	EXELON NUCLEAR
Ian Jung	NRC/NRO/DE
Ken Carlson	ENERCON
Julle Curran	ENERCON

Sign In Sheet

Draft ISG-6, "Digital I&C Licensing Process"

DATE: March 24, 2010

Name	Organization
Norbert Carter	NRR/DE/EICB
Edward Thomas	NRC/NRR
Kenneth Schrader	PG & E
Tim Mossman	NRC/NRR/DE/EICB
STEVEN ARNDT	NRR/DE
Terry Jackson	NRC/DE/ICE1
FRANK J. MASCITELLI	EXCELON NUCLEAR LICENSING
Anthony Chu	Lockheed Martin
THOMAS FREDETTE	NRC/DCIP
Lis James	USNRC/NRR/DRA
Richard Stottel	NRC/NRR/DE/EICB
Gush Smith	NRC/NRR/DE/EICB
DAVID T. BAUGLEY	TVA
STEVEN A. HILLOS	TVA
Allen Howe	NRC

Sign In Sheet

Draft ISG-6, "Digital I&C Licensing Process"

DATE: March 24, 2010

Name	Organization
Gordon Cleaton	NEI
Brian Haynes	INVENSY
Ken Scarola	MAES - NAC
Warren Odess-Giwert	WESTINGHOUSE
John Heffler	Altra / PG&E
Tolani Dudson	Duke Energy
STEVEN MIRSKY	SAIC
John Buttery	NEI
Pat Kiland	NRC
PARTICIPANTS VIA - PHONE	
MARK BURZYNSKI	AREVA NP INC.
JAY PRITCHETT	PROGRESS ENERGY
ROSSNYEV ALVARADO	MPR ASSOCIATES
RONALD JARRETT	TVA
ROBERT PLAPPERT	HUKARI

Record of Parking Lot Items from March 24, 2010, Public Meeting to discuss comments on Interim Staff Guidance ISG-6, "Digital I&C Licensing Process"

ISG-6

The NRC staff will continue to review the utilization of documents from the Oconee digital I&C upgrade to inform the list of documents to be submitted.

The NRC staff will explore the feasibility of using information technology (e.g., using Sharepoint or similar information-technology tool) to review documents prior to docketing.

The NRC staff will clarify both the information needed and when, in the review process it is needed.

The NRC staff will clarify what documentation is needed to describe and justify changes made to a previously reviewed platform when the previous approval is used as precedent.

Non-ISG-6

The scope of a Digital I&C Review (Would need to be addressed by a revision to Chapter 7 of the Standard Review Plan).

Use of license conditions to review acceptance testing (Would need to be implemented through Part 50 rulemaking).

ISG-6, it is not appropriate to implement such changes with the guidance. The NRC staff did offer to explore the feasibility of using available information-technology to more efficiently and effectively identify which information needs to be docketed. This activity, however, would only serve to add efficiency and effectiveness to docketing of the information that the NRC staff continues to need in reaching its safety conclusion.

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G. Edward Miller, Project Manager
 Plant Licensing Branch I-2
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation

Enclosures:

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2. Parking Lot Contents

DISTRIBUTION:

PUBLIC	RidsNrrDorl Resource	RidsNrrDorlLp1-1 Resource	LPLI-2 R/F
RidsNrrDorlLp1-2 Resource	RidsNrrDorlLp2-1 Resource	RidsNrrDorlLp2-2 Resource	AHowe, NRR/DORL
RidsNrrDorlLp3-1 Resource	RidsNrrDorlLp3-2 Resource	RidsNrrDorlLp4 Resource	CTucci, NRR
RidsRgn1MailCenter Resource	RidsRgn2MailCenter Resource	RidsRgn3MailCenter Resource	
RidsRgn4MailCenter Resource	RidsOgcRp Resource	NRC Participants	SWalker, NRR
LTrocine, EDO, Region I & III	JAdams, EDO, Region II	RidsAcrcAcnw_MailCTR Resource	
SWilliams, EDO, Region IV	RidsPMGMiller Resource	RidsNrrLAABaxter Resource	
RidsNrrDorlLp3-1 Resource	TFredette, NRO/DE	WKemper, NRR/DE	
ADAMS Accession No. ML100980131			

OFFICE	NRR/LPLI-2/PM	NRR/LPLI-2/LA	LPLIII-1/BC
NAME	GEMiller	ABaxter	LJames
DATE	4/21/10	4/19/10	4/21/10