

Michael T. Lesar
Chief, Rule making and Directives Branch (RDB)
Division of Administrative Services
Office of Administration
Mail Stop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001
(FAX) 301-492-3446

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(3)

Subject: Comment on Draft BTP-719 Rev. 6 (ML094390771) - Docket ID NRC-2010-0138

- (1) BTP 7-9 Rev. 6 does not mention SRP Section 7.8, which contains acceptance criteria for diverse actuation systems; BTP 7-19 should mention SRP Section 7.8, "Diverse Instrumentation and Control Systems," in Section A.1.7, "Diverse Backup Method."
- (2) Regarding BTP 7-19 Section B.1.3, "Combining RTS and ESFAS": The second sentence is not correct. The traditional I&C in Westinghouse plants combined RTS and ESF function in the Foxboro H-Line, Westinghouse 7100 Series, Westinghouse 7300 Series, Eagle 21 and SSPS systems.
- (3) BTP 7-19 does not mention NUREG/CR-6042 Rev. 2 Section 1.1.5, "Defense in Depth," in Section A.1, "Relevant Guidance;" BTP 7-19 should mention /CR-6042 Rev. 2 Section 1.1.5, "Defense in Depth," in Section A.1, "Relevant Guidance."
- (4) BTP 7-19 does not explicitly mention IEEE 603 Clause 6.2, "Manual Control," in Section A.1, "Regulatory Basis;" BTP 7-19 should mention IEEE 603 Clause 6.2, "Manual Control.," in Section A.1, "Regulatory Basis"
- (5) BTP 7-19 does not explicitly mention IEEE 279 Clause 4.17, "Manual Initiation," in Section A.1, "Regulatory Basis;" BTP 7-19 should mention IEEE 279 Clause 4.17, "Manual Initiation," in Section A.1, "Regulatory Basis."
- (6) BTP 7-19 does not explicitly mention Regulatory Guide 1.62, "Manual Initiation of Protective Actions," in Section A.1, "Relevant Guidance;" BTP 7-19 should mention Regulatory Guide 1.62, "Manual Initiation of Protective Actions," in Section A.1, "Relevant Guidance."
- (7) Regarding Section B.3.3, "Single Failure and CCF": The first clause of the first sentence is not correct. RG 1.53 Rev. 2 dated November 2003 endorses IEEE Std 379-2000. IEEE 379 Clause 5.5, "Common-cause failures," states: "Certain common cause failures shall be treated as single failures when conducting single-failure analysis..."
- (8) Regarding BTP 7-19 Section A.1, "Regulatory Basis," and BTP 7-19 Section B.1.8, "Potential Effects of CCF: Failure to Actuate and Spurious Actuation,": BTP 7-19 Section B.1.8 states, "Software or software logic based CCF was declared a 'beyond-DBE' by the Commission in the SRM issued in response to SECY-93-087." This conflicts with the listing of design basis regulatory requirements. The design basis regulatory requirements listed in this section are applicable to certain I&C systems, but not to a D3 analysis. Listing a bunch of regulations that are not applicable only cause regulatory uncertainty.

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add = S. Burrows (5962)

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