NUCLEAR ENERGY INSTITUTE

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July 15, 2010

Mr. John A. Grobe
Deputy Director, Engineering and Corporate Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Interim Staff Guidance 6, "Digital Instrumentation and Controls Licensing Process"

Project Number: 689

Dear Mr. Grobe:

This letter is a response to your June 30 letter that provided a draft of Interim Staff Guidance (ISG) 6, "Digital Instrumentation and Controls Licensing Process," for comment. In accordance with your request, NEI has reviewed the document to identify areas where we believe ambiguity remains in the manner by which industry comments have been addressed. These comments are provided in the attached table. This review has been limited by the time available; nevertheless, we appreciate the opportunity afforded and recognize that efforts to improve the document by NRC and industry will continue.

Industry comments on a previous draft of the staff guidance were discussed during a May 20, 2010, public meeting. This meeting was very productive and helped all parties better understand how industry comments would be addressed. Key comment areas that have not been fully resolved and will need to be addressed in the future were clearly identified. Many of the unresolved comments are captured by the general concern that the level of detailed design review called for by the staff guidance is more appropriate for an independent design verification and goes beyond what is necessary for a reasonable assurance determination. We anticipate that as experience is gained through use of the document we will have further opportunities to optimize the guidance and resolve any remaining issues.

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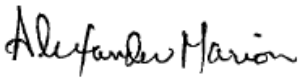
If you have any questions, please contact me at 202.739.8080; am@nei.org or John Butler at 202.739.8108; jcb@nei.org

Sincerely,



Alexander Marion

Attachment

c: Document Control Desk, NRC