Comments on DI&C-ISG-06 rev 44

Item	Section, Page, Location	Comment	Proposed Resolution
1	Section B.1.3 Page 4 of 93 3rd Paragraph	It should, be noted that the operating fleet generally does not have a chapter 18 in the FSAR, since it is a newer addition to the SRP.	Delete: The acceptability of the human-machine interface as described in Chapter 18 of the SAR.
2	Section B.1.4 Page 6 of 93 1st Paragraph	Typo: … testing, .and .operation …	Typo: Remove errant periods.
3	Section B.1.4 Page 6 of 93 2nd Paragraph	Typo: … IEEE 603-1991, "," states: …	Revise: IEEE 603-1991, "IEEE Standard Criteria for Safety Systems for Nuclear Power Generating Stations – Description," states: …
4	Section B.1.5 Page 7 of 93 2nd Paragraph	Typo: IEEE 282 …	Revise: IEEE 828 contains normative clauses regarding verification activities, configuration audits, and reviews.
5	Section B.1.5 Page 7 of 93 3rd Paragraph	Typo: IEEE 282 …	Revise: IEEE 828 contains normative clauses regarding verification activities, configuration audits, and reviews.
6	Section C Page 7 of 93 1st Paragraph	New text addition is nonsensical. If a standard is not a method acceptable to the staff for meeting regulations, why is it suitable for guiding a review?	Revise for clarity…The caveat is that, since all standards have not been endorsed to meet specific regulations, a single standard's normative material by itself may not provide a sufficient, NRC approved method for meeting a Regulation.
7	Section C Page 8 of 93 2nd Paragraph	Typo: … clearly indicate they type (e.g., licensing review, licensing audit, & regional inspection)…	Revise: ... clearly indicate the type (e.g., licensing review, licensing audit, & regional inspection)…
8	Section C Page 8 of 93 2nd Paragraph	Typo … (e.g., Phase 1, 2, & 3 – See Enclosure C) of regulatroy oversight activities.	Revise: … (e.g., Phase 1, 2, & 3 – See Enclosure C) of regulatory oversight activities.
9	Section D.1.3 Page 14 of 93 2nd Paragraph	Text references NUREG/CR-6101.	NRC Action: It would be helpful to make NUREG/CR-6101 available on the NRC website on the NUREG document collection page.

Item	Section, Page, Location	Comment	Proposed Resolution
10	Section D.1.5 Page 14 of 93 1st Paragraph	Typo: … confirm portion of the system…	Revise: ... confirm portions of the system…
11	Section D.2.2 Page 15 of 93 2nd Paragraph	Hardware is not “developed in accordance with the associated programmatic documentation” but rather in accordance with Appendix B compliance processes.	Revise: … developed in accordance with Appendix B compliance processes.
12	Section D.2.5 Page 16 of 93 1st Paragraph	Typo: … confirm portion of the system…	Revise: ... confirm portions of the system…
13	Section D.3.5 Page 17 of 93 1st Paragraph	Typo: … confirm portion of the system…	Revise: ... confirm portions of the system…
14	Section D.4.4.2.3 Page 32 of 93 2nd Paragraph	It is not evident to what the “two types of activities” is referring, since more than two items follow.	Identify “two types of activities”
15	Section D.4.4.2.5 Page 34 of 93 1st Paragraph	Typo: … is unnecessary, and should be removed.	Revise: Remove errant comma.
16	Section D.4.4.3.1 Page 35 of 93 1st Paragraph	Typo: The SRS documents the results of all the requirements activities and documents the required aspects of the safety system.	Revise: The SRS documents the results of all the requirements, activities, and the required aspects of the safety system.
17	Section D.4.4.3.5 Page 37 of 93 2nd Paragraph	Typo: … of documentation upto the…	Revise: … of the documentation up to the …

Item	Section, Page, Location	Comment	Proposed Resolution
18	Section D.4.4.3.6 Page 38 of 93 2nd Paragraph	Typo: … of documentation upto the…	Revise: … of the documentation up to the …
19	Section D.5.2 Page 39 of 93 1st Paragraph	Typo: …within its design basis normal and adverse environments.	Revise: …within its design basis for normal and adverse environments.
20	Section D.5.2 Page 39 of 93 2nd Paragraph	Typo: …miscellanious	Revise: …miscellaneous
21	Section D.9.2 Page 54 of 93 1st Paragraph	Typo: … embedded within the LARdocumentation.	Revise: … embedded within the LAR documentation.
22	Section D.10.4.2.3.2 Page 76 of 93 3rd Paragraph	Typo: If, however, it can not be proven …	Revise: If, however, it cannot be proven …
23	Section D.12.1 Page 88 of 93 1st bullet	The inclusion of the examples (e.g., backdoor coding and dead code) as the example for undocumented code creates confusion with the scope of cyber security covered by RG 5.71. Undocumented code with backdoor coding sounds like a malicious act that is not within the scope of RG 1.152. It belongs with RG 5.71. Dead code is not undocumented code.	Delete: (e.g., backdoor coding and dead code)
24	Section D.12.4 Page 90 of 93	Does it make sense to quote so much from DG-1249, which has recently been released for public comment? To incorporate all the details of the DG potentially sends a message that public comments have been prejudged.	Revise as appropriate.

Item	Section, Page, Location	Comment	Proposed Resolution
25	Section D.12.4 Page 90 of 93 1st Paragraph	The inclusion of the examples (e.g., backdoor coding and dead code) as the example for undocumented code creates confusion with the scope of cyber security covered by RG 5.71. Undocumented code with backdoor coding sounds like a malicious act that is not within the scope of RG 1.152. It belongs with RG 5.71. Dead code is not undocumented code.	Delete: (e.g., backdoor coding and dead code)
26	Section D.12.5 Page 92 of 93 1st Paragraph	The inclusion of the examples (e.g., backdoor coding and dead code) as the example for undocumented code creates confusion with the scope of cyber security covered by RG 5.71. Undocumented code with backdoor coding sounds like a malicious act that is not within the scope of RG 1.152. It belongs with RG 5.71. Dead code is not undocumented code.	Delete: (e.g., backdoor coding and dead code)