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Gordon A. Clefton SENIOR PROJECT MANAGER **ENGINEERING & OPERATIONS SUPPORT NUCLEAR GENERATION DIVISION** 

Ms. Cindy K. Bladey Chief, Rules, Announcements, and Directives Branch Office of Administration U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Subject: Comments on Six Complimentary Draft Regulatory Guides on Digital Computer Software Used in Safety Systems of Nuclear Power Plants (Docket ID NRC-2012-0195)

**Project Number: 689** 

Dear Ms. Bladey:

The NRC, through Federal Register Notices and Docket ID: NRC-2012-0195, issued for public comment six draft Regulatory Guides (DG-1206, DG-1207, DG-1208, DG-1209, DG-1210, and DG-1267). The Nuclear Energy Institute (NEI)<sup>1</sup> offers the following comment for NRC consideration.

In response to the specific question provided in the Federal Register Notice, the revision to Regulatory Guide 1.168 (DG-1267) should not endorse IEEE Standard 1012-2004 because it has already been superseded by IEEE Standard 1012-2012. NEI recommends that the regulatory guide revision be postponed until the staff can endorse the current active standard.

NEI requests an opportunity to discuss the manner in which public comments are addressed prior to the finalization of these Regulatory Guides. If you have any questions or require additional information, please contact me at 202-739-8086, gac@nei.org.

Sincerely.

Gordon A. Clefton

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<sup>&</sup>lt;sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.