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Subject: PWR Owners Group
PWR Owners Group Comments on Draft NRC Regulatory Issue Summary, "Embedded Digital Devices in Safety-Related Systems, or Systems Important to Safety and Items Relied on for Safety, ML12248A065 - Docket ID NRC-2013-0098"

Attention: Cindy Bladey, Chief, Rules, Announcements, and Directives Branch (RADB),
Office of Administration,
Mail Stop: TWB-05-B01M,
U.S. Nuclear Regulatory
Commission, Washington, DC 20555-0001

Draft "NRC Regulatory Issue Summary 2013-#### "Embedded Digital Devices in Safety-Related Systems, Systems Important to Safety, and Items Relied on for Safety," was issued for comment per Federal Register / Vol. 78, No. 97 dated Monday, May 20, 2013.

The PWROG agrees that licensees should be aware of the potential impacts of making plant modifications associated with digital devices, and that all of the potential impacts need to be identified, and evaluated correctly, thoroughly, and completely to determine whether prior NRC approval is required.

However, it is essential that the industry preserve the capability to make modifications involving digital devices using the criteria of 10 CFR 50.59, after completing a thorough evaluation of the potential impacts. Not only is this necessary to address equipment obsolescence and aging, but in many cases improved reliability and safety can be realized through the unique capabilities of digital devices such as self checking features. The ability to make carefully considered and thoroughly evaluated modifications involving digital devices using 10 CFR 50.59 represents the most efficient use of industry and NRC resources.

The PWROG appreciates the opportunity to comment on this draft RIS.

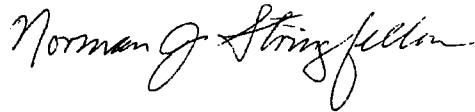
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If you have any questions, please do not hesitate to contact me at (205) 992-7037, or Mr. W. Anthony Nowinowski at (412) 374-6855.

Sincerely,



Jack Stringfellow, Chairman
PWR Owners Group

CMH:las

cc: PWROG Management Committee
PWROG I&C Working Group
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