

The industry believes that, in its current form, the ISG is not ready for implementation. The document is a step in the right direction, and accepts most, if not all, of the industry's earlier comments. The difficulty comes in the practical application of the "Relaxation Cases." As currently written, these are complicated and not easy to demonstrate compliance.

To determine the readiness of the ISG for application, the industry evaluated the current draft of the ISG on three plants, and none of them met the criteria. In one case, the plant did not have a remote shutdown panel, so the result was expected. However, in another case, at a plant where the 0.1 would be appropriate, the criteria were not met. The industry would be interested in discussing any evaluations the NRC did of the current draft of the ISG.

The industry maintains that the most valuable work is in continuing to work on the FAQ, which addresses modeling abandonment in the FPRA in addition to the HRA discussion.