

PUBLIC SUBMISSION

As of: 9/4/15 5:29 PM
Received: August 25, 2015
Status: Pending_Post
Tracking No. 1jz-8kr8-yy9p
Comments Due: August 31, 2015
Submission Type: Web

Docket: NRC-2015-0153

Design and Analysis Computer Commercial-Grade Dedication Requirements

Comment On: NRC-2015-0153-0001

Acceptance of Commercial-Grade Design and Analysis Computer Programs for Nuclear Power Plants; Draft Regulatory Guide; Request for Comment

Document: NRC-2015-0153-DRAFT-0003

Comment on FR Doc # 2015-16131

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7/1/2015
80 FR 37666

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General Comment

Chapter 15 of the NRC's "Standard Review Plan (SRP) for the Review of Safety Analysis Reports for Nuclear Power Plants" (NUREG-0800) and the "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants" (Regulatory Guide 1.70) describe a subset of the transient and accident events that must be considered in the safety analyses required by 10 CFR 50.34. In support of that activity, Regulatory Guide 1.203, "Transient and Accident Analysis Methods" describes a multi-step process for developing and assessing evaluation models, and provides guidance on related subjects, including software quality assurance, documentation, and a graded approach to the process.

Related safety analysis software invokes simplifications, assumptions, models and correlations subject to uncertainty, and inherent compensating errors. RG 1.203 recognizes the unique challenge placed on such software and introduces the concept of the Evaluation Model for assuring the appropriate selection, classification, quality assurance, and use of these computer codes in this setting. Further, while SRP Section 15.0 makes specific reference to the applicability of RG 1.203, the NRC has noted on at least one other occasion (i.e., USEPR DCA RAI No. 1, ADAMS Accession #ML081490343) that it is applicable in other areas.

By explicitly mentioning accident analysis, DG-1305 (via EPRI 1025243) is confusing in that it appears to introduce an alternative acceptance pathway for related activities applicable to RG 1.203. Consequently, coincident use of these two guidance documents is error prone. It is

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recommended that the proposed regulatory guide clearly distinguish the scope and any interfaces between these two guidance documents. As RG 1.203 is clear about user expectation, it is preferable for DG-1305 to include a statement such as "the applicability of the EPRI 1025243 excludes the selection, classification and quality assurance of software for accident and transient analysis addressed in RG 1.203."