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November 16, 2015

Ms. Cindy Bladey  
Office of Administration, OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry comments on changes to thirty three individual sections of Chapter 7, "Instrumentation and Controls," of "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," (NUREG-0800) (Docket ID NRC-2015-0211)

**Project Number: 689**

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> appreciates the opportunity to comment on Chapter 7, "Instrumentation and Controls," of "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," (NUREG-0800) (Docket ID NRC-2015-0211).

The industry appreciates that the revisions to the thirty-three SRP sections reflect no changes in Staff position and they clarify the original intent of these SRP sections. Very few issues were identified by the industry reviewers with only one item of significance as described below:

On Table 7-1, Page T-7-1-7, Safety System Regulatory Guides (e.g., RG. 1.152, RG 1.168) are currently listed as Acceptance Criteria for the non-safety SRP sections (i.e., 7.5 Information Systems Important to Safety, 7.6 Interlock Systems Important to Safety, 7.7 Control Systems, 7.8 Diverse Instrumentation and Control Systems). NEI proposes to remove the safety system Regulatory Guides as Acceptance Criteria for the non-safety SRP sections.

<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.

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Ms. Cindy Bladey  
November 16, 2015  
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If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gordon A. Clefton", with a long horizontal flourish extending to the right.

Gordon A. Clefton