

## RulemakingComments Resource

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**From:** Ancient Druid <ancientdruid1424@gmail.com>  
**Sent:** Wednesday, January 13, 2016 10:08 PM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] Fwd: Docket PRM-50-112 / NRC-2015-0213  
**Attachments:** PRM\_50\_112\_ITS.doc

Attached is a letter providing comments on petition PRM-50-112 (NRC-2015-0213) concerning the definition of "Important to Safety." I will also provide these comments via US Postal Service mail.

Paul Sicard

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13 January 2016

Secretary  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff  
(Rulemaking.Comments@nrc.gov)

Subject: Docket No. PRM-50-112; NRC-2015-0213  
"Important to Safety"

Dear Sir/Ma'am:

This letter provides my comments, as a nuclear power professional with over 30 years experience, concerning petition PRM-50-112 which urged the NRC to adopt a definition of "Important to Safety."

The proposal would be a desirable enhancement to the regulatory structure. However, there are other items that may have greater positive impact in improving both reactor safety and regulatory efficiency than addressing the inconsistent use of this term. A 10CFR50 definition of the term may not be required; an alternative might be a Regulatory Issue Summary (RIS) document or similar which can provide more detail than the current definition in the NRC-endorsed NEI 96-07 document, as well as providing clarification of differences in the definition of "Important to Safety" in different applications.

- \* In defining the term, more examples and specifics on what is and what is not "Important to Safety" would increase regulatory clarity, consistency, and stability.
- \* A more precise definition would benefit the development of nuclear Standards and thus contribute to the efficiency of development of new nuclear designs.
- \* FLEX equipment for Beyond Design Basis Events (e.g., post-Fukushima accident mitigation actions) and Severe Accident Mitigation equipment should not be considered "Important to Safety" unless there is a significant change to the current regulatory structure (e.g., a strongly risk-informed 10CFR50.59 process)
- \* One simple change to consider would be revising 10CFR100 Appendix A to use the more consistent term "Safety Related" vice "Important to Safety."

Development and implementation of a risk-informed 10CFR50.59 process would be an initiative with far greater benefit to nuclear safety and regulatory efficiency, although that would be a far resource-intensive initiative. A risk-informed 10CFR50.59 change process could also encompass change processes for Emergency Operating Procedures, Severe Accident Management Guidelines, FLEX and B.5.b large scale damage mitigating procedures, and other beyond design basis events. It may prove too much of an effort to be feasible for the current generation of licensed reactors, but should be considered for future designs.

Yours truly,

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