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<b>As of:</b> 2/5/16 1:36 PM
<b>Received:</b> February 01, 2016
<b>Status:</b> Pending Post
<b>Tracking No.</b> 1k0-8npw-j93z
<b>Comments Due:</b> February 01, 2016
<b>Submission Type:</b> Web

11/16/2015  
80 FR 70850

**Docket:** NRC-2012-0167  
Draft NUREG for Comment

**Comment On:** NRC-2012-0167-0011  
Preparing and Reviewing Licensing Applications for Instrumentation and Control Systems for Non-power Reactors; Draft NUREG for Comment

**Document:** NRC-2012-0167-DRAFT-0018  
Comment on FR Doc # 2015-29029

## Submitter Information

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 2016 FEB -5 PM 3:24  
 RULES AND PROCEDURES  
 DIVISION

## General Comment

U.S. Nuclear Regulatory Commission January 31, 2016  
Washington, DC 20555-001

**SUBJECT:** Comments regarding draft ISG NUREG 1537 Docket ID NRC-2012-0167

Thank you for the opportunity to comment on the draft Interim Staff Guidance (ISG) for NUREG 1537 which updates Chapter 7 regarding instrumentation and control license applications and amendments for Non-Power Utilization Facilities (NPUF).

I am writing to add my support to the comments submitted on 01-Feb-2016 by the following parties:

- o Mark A. Trump of the Penn State Breazeale Nuclear Reactor
- o Thomas H. Newton Jr. of the NIST Center for Neutron Research
- o Daniel J. Cronin

The submittals by these gentlemen do an excellent job conveying my concerns, so rather than restating them, I request that you give due consideration to their comments.

In addition, I would like to add a suggestion regarding ambiguous use of the very term "digital" in regards to I&C systems. Despite the fact that "digital" covers a vast variety of technologies, ranging from simple numeric displays to general-purpose programmable computers, this is not clearly conveyed in the ISG. On page 11 of the ISG, it is stated that most replacement digital systems will require an NRC review (versus a

*SONSI Review Complete  
Template = ADM-013*

*E-RIDS = ADM-03  
Call = D. Hardesty (dah 7)*

50.59 change), but it does not convey how digital the system needs to be to cross this threshold. A predominantly analog I&C system with digital indicators should require a different level of scrutiny than an entirely programmable system.

In Section 11 of the recent NRC document "Effective Practices for the Establishment and Maintenance of Adequate Cyber Security at Non-Power (Research and Test) Reactor Facilities", some thought has been put into categorizing digital equipment by risk, including a bulleted list organized by potential risk. An example is given on page 92 of digital indications replacing analog components, and the statement is made, "Their use in this manner would likely have no discernible impact on the safety or reliability of the reactor operation or on the ability to initiate a reactor SCRAM, but they would still need to be fully evaluated in accordance with 10 CFR 50.59." Efforts should be made in the ISG to take a better risk-informed approach that is less ambiguous regarding potential risks of things that are "digital".

Best regards,  
Andrew Kauffman  
Columbus, Ohio