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

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Comment on FR Doc # 2015-29029

Submitter Information

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General Comment

See attached file(s)

Attachments

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January 31st 2016

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Re: Comments on draft ISG NUREG 1537 Chapter 7., Docket NRC-2012-0167

Thank you for the opportunity to comment on the draft interim Staff Guidance for NUREG 1537 Chapter 7 regarding changes to Instrumentation and Control features of non-power reactors.

As a small facility with modest staff and other resources, we have operated safely and successfully for almost 50 years and look forward to imminent license renewal. While our I&C is largely analog we have made some modest steps to included digital indicators which substantially reduce operator errors and increase training success of operators. There is no doubt in our minds that to continue we will need to modernize further and include "digital" instrumentation to improve reliability, and thus safety of operations. In addition to this as an educational institution it behooves us to use modern equipment for students to experience as a "digital" revolution sweeps all fields from automobiles to refrigerators. As our students are mostly chemists or chemical engineers, they have been surprised that the pH meters they use have been digital throughout their lifetime, but a nuclear reactor is not yet permitted to be so!

Research non-power nuclear reactors that demonstrate safe and reliable operations should not be allowed to remain in the past as a result of largely unwarranted fears of failures or uncontrolled interruptions of modern circuitry. It seems that facilities like ours would be "locked in" to the past if a more thoughtful and graded review approach based on real performance data and real safety concerns is not available to us without immense effort and dedication of time and money that clearly we cannot invest. The draft ISG provides many examples of obstacles to straightforward upgrading of I&C systems.

Other facilities, especially PSU, U. Florida, and NRNC, have spent considerable time and effort detailing the issues and suggesting improvements needed to the draft. We heartily endorse their findings and respectfully request that their concerns be seriously addressed before re-drafting of this ISG.

Sincerely,

George E. Miller

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