

## **RESPONSE TO PUBLIC COMMENTS ON DRAFT STANDARD REVIEW PLAN 7: Instrumentation and Controls**

On September 16, 2015, a Notice of Opportunity for Public Comment was published in the Federal Register (80 FR 55654) on the proposed revision to Chapter 7 of NUREG-0800, Standard Review Plan (SRP). This revision included changes to 33 individual sections of Chapter 7, "Instrumentation and Controls," to provide staff guidance in reviewing the design of instrumentation and controls and auxiliary systems under Parts 50 and 52 of Title 10 of the *Code of Federal Regulations* (10 CFR). One comment was received from the Nuclear Energy Institute (NEI).

NEI Gordon Clefton ADAMS Accession No. ML15324A251
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The NRC staff's review and disposition of the comment is provided in the following table.

**Table 7-1, “Regulatory Requirements, Acceptance Criteria, and Guidelines for Instrumentation and Control Systems Important to Safety”**

No.	Reference	Comment Submissions	NRC Resolution
NEI 1	Page T-7-1-7	<p>Safety Systems Regulatory Guides (e.g., RG 1.152, RG 1.168) are currently listed as Acceptance Criteria for 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.</p>	<p>Staff disagrees with the comment and provides the following clarification.</p> <p>The staff’s proposed update to SRP Chapter 7 focused on changes consistent with the recently issued software regulatory guides, and editorial changes.</p> <p>In SRP Table 7.1, several regulations may apply to important-to-safety systems addressed by SRP Sections 7.5 – 7.8. These regulations include portions of 10 CFR 50.55a (h), the Three Mile Island Actions in 10 CFR 50.34(f)(2), and the General Design Criteria in 10 CFR Part 50, Appendix A. To the degree those regulations are applicable to important-to-safety systems, the regulatory guides provide an acceptable approach to meet those regulations.</p> <p>Subsections 3, 4, and 5 of SRP Appendix 7.1-A identify the guidelines applicable to the instrumentation and control systems important-to-safety and describe the method and scope of the review to verify conformance.</p> <p>The use of criteria from these safety standards, though not required by regulation, can be applied to non-safety and important-to-safety systems to achieve similar levels of quality and performance. Nonetheless, the SRP affords applicants the flexibility to use an alternative approach, provided the applicant justifies that approach.</p>