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February 23, 2016

Mr. Michael Waters
Chief, Instrumentation and Controls Branch
Division of Engineering
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on NRC Agency-wide Digital I&C Action Plan to Improve Regulatory Processes, Draft Revision 0 (ML16014A085)

Project Number: 689

Dear Mr. Waters:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ provides the following comments on the Draft NRC Agency-wide Digital I&C Action Plan to Improve Regulatory Processes, Draft Revision 0 (ML16014A085). We appreciate the opportunity to provide comments on the initial draft of this action plan. Achieving alignment on key technical issues and making efficiency improvements in regulatory documents and processes associated with Digital I&C is of high importance to the industry and we are encouraged that the NRC views these topics as high priority as well.

The attached table contains industry comments on the action plan. We understand that this document will be a working document and there will be additional opportunities to provide input and updates as we progress on the plan. Our goal is to align the NEI Digital Roadmap actions with the NRC Action Plan.

An overarching comment of note is that this plan does not clearly or specifically address reaching technical alignment between NRC and industry on (1) deterministic defensive measures that facilitate reaching a Common Cause Failure (CCF) unlikely conclusion and (2) efficient methods to demonstrate that unprevented CCF are bounded by other previously analyzed accidents. Having this alignment is an essential prerequisite to every item in this plan, for both safety and non-safety systems. Bounding is a fundamental and critical

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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issue to the industry that affects other action plan items. NEI recommends that a high priority action item be created to address these issues on an expedited schedule.

We look forward to working with NRC staff to address and resolve these important issues. If you have any questions or need clarification on any of our comments, please contact Jason Remer (sjr@nei.org, (202) 739-8112) or me (seg@nei.org, (202) 739-8111).

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen E. Geier". The signature is fluid and cursive, with the first name "Stephen" and last name "Geier" clearly distinguishable.

Stephen E. Geier

Attachment