

**From:** [Kurt Schaefer](#)  
**To:** [DeJesus, Anthony](#)  
**Subject:** [External\_Sender] Re: Comments received on PRM-50-112, "Determining Which Structures, Systems, Components and Functions are Important to Safety" [NRC-2015-0213]  
**Date:** Tuesday, March 22, 2016 9:36:52 PM

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Dear Anthony;

Thank you for the update.

I have read the comments, and do not think they understand the regulatory bases of how the proposed important to safety (ITS) criteria were generated. Criteria (a) through (h) are directly linked to existing regulations. Therefore, there is no conflict between existing regulations and the proposed ITS criteria.

Criteria (i) and (j), although may not be directly linked to specific regulations, are linked to existing regulatory guidance and requests, as committed to in plants' licensing bases. However, with respect to the comments to delete criteria (i) and (j), these criteria could be combined to just read "*Beyond design basis event mitigation manual and equipment functions (including associated functional capabilities), as described in the current plant licensing basis,*" and severe accident and Fukushima Dai-ichi accident mitigation addressed in a follow-on regulatory guide.

Multiple comments requested that guidance should be issued before a regulation is issued. This approach is be "putting the cart before the horse," and has already failed for over 40 years. The NRC and industry have unsuccessfully tried to have ITS guidance documents since the early 1980s, without ever achieving a clear understanding of what SSCs are ITS. The only possible success path is to first determine the ITS criteria, and followed by a regulatory guidance. However, the guidance can be generated in parallel with the regulation.

One comment inferred that the three safety-related criteria are not understood. I worked for both GE and Westinghouse for over 40 years, and they have no problem understanding the safety-related criteria. However, a GE safety standard says not to use the term "important to safety", because it is an undefined term.

I would be happy to help (at no cost) NRC with the development of the regulation and any guidance. Because I "live on the road", it is best to contact me by email.

If you have any comments or questions, please send them to me.

Regards;

Kurt Schaefer