

**Staff Responses to Public Comments
Draft Regulatory Guide (DG)-1315
(Proposed Revision 5 of Regulatory Guide (RG) 1.29)**

A notice that Draft Regulatory Guide DG-1315 (Proposed Revision 5, of RG 1.29) was published for public comment appeared in the *Federal Register* on September 17, 2015 in Vol. 80, No. 180, pp. 55878-79. The public comment period ended November 16, 2015.

Comments were received from:

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Commenter	Section of DG-1315	Specific Comment	NRC's Resolution
GE Hitachi	General Comment	DG-1315, Paragraph C.1.h, refers to RG 1.97 for "specific criteria for instruments which need to be seismically qualified", and also refers to "Accident monitoring instrumentation Category 1". Information of this type was provided in Revision 3 of RG 1.97. However, the current revision of RG -1.97 that is referenced by DG-1315 (RG 1.97, Revision 4 (06/2005), is not explicitly referenced, but the title of RG 1.97 was changed from Revision 3 to Revision 4 and the Revision 4 title is listed in Reference 5 of DG-1315) does not mention the term "Category 1," nor does it directly provide specific criteria. These details appear in IEEE-497-2002, which is referenced by RG 1.97, Revision 4."	The guide is intended for staff use for future applications and the expectation is that the staff will use the more recent version of a RG. Having said that, to address GE Hitachi's comments Section C. 1h was revised to read as follows: 1h. " accident monitoring instrumentation - RG 1.97 provides criteria for accident monitoring instrumentation for nuclear power plants through endorsement (with exceptions) of IEEE-497-2002.

		<p>Note the following excerpt from the "Discussion" section of RG 1.97, Revision 4, which makes the point above.</p> <p>"Given its prescriptive nature, Revision 3 of Regulatory Guide 1.97 quickly became the de facto standard for accident monitoring, and both ANSI/ANS-4.5-1 980 and IEEE Std. 497-1981 fell out of use and were subsequently withdrawn as active standards. Nonetheless, Revision 3 of Regulatory Guide 1.97 has become outdated, in that it does not provide criteria for advanced instrumentation system designs based on modern digital technology. Revision 3 also does not address the need for technology-neutral guidance for licensing new plants. In addition, the guidance should be less prescriptive and based on the accident management functions of the individual variable types.</p> <p>With the increased use of digital instrumentation systems in advanced nuclear power plant designs, the nuclear industry came to recognize a need to develop a consolidated standard that was more flexible than Revision 3 of Regulatory Guide 1.97. Instead of prescribing the instrument variables to be monitored (as was the case in Revision 3), the industry recognized the advantage of providing performance-based criteria for use in selecting variables. Similarly, rather than providing design and qualification criteria for each variable category, the industry sought to standardize the criteria based on the accident management functions of the given type of variable. These efforts resulted in the development of IEEE Std. 497-2002, "IEEE Standard Criteria for Accident Monitoring Instrumentation for Nuclear Power</p>	
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		<p>Generating Stations," by the IEEE Power Engineering Society, Nuclear Power Engineering Committee, Subcommittee 6, Working Group 6.1, "Post-Accident Monitoring."</p> <p>Section C "Regulatory Position" RG 1.97, Revision 4, states: "This regulatory guide endorses IEEE Std. 497-2002, "IEEE Standard Criteria for Accident Monitoring Instrumentation for Nuclear Power Generating Stations," as an acceptable method for providing instrumentation to monitor variables for accident conditions, subject to the following regulatory positions:... [regulatory clarifications on the application of IEEE 497]."</p>	
Mack Mike	General Comment	<p>General Comment</p> <p>A survival knife is essential element and a weapon. Many people do not know about survival knife. I want every people know about survival knife. I found a site, this site content full fill about survival knife, military knife, rambo survival knife etc. So I want to share this site for everybody. This site link is: http://www.healthandpersonalcare-products.com/category/household-supplies/best-survival-knife/</p>	<p>This comment is not within the scope of the draft guide. No changes were made in response to this comment.</p>