

# PUBLIC SUBMISSION

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**Docket:** NRC-2016-0068

Integrated Action Plan to Modernize Digital Instrumentation and Controls Regulatory Infrastructure

**Comment On:** NRC-2016-0068-0001

Integrated Action Plan to Modernize Digital Instrumentation and Controls Regulatory Infrastructure;  
Preliminary Draft Action Plan for Comment

**Document:** NRC-2016-0068-DRAFT-0005

Comment on FR Doc # 2016-07112

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*81 FR 17740*

*4*

## Submitter Information

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## General Comment

See attached file(s)

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RULES AND DIRECTIVES  
COMPLIANCE  
SECTION

## Attachments

TChapman Comment DI&C IAP Rev 0

SUNSI Review Complete  
 Template = ADM - 013  
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 Add= *T. Keene (JTK)*

April 24, 2016

Ms. Cindy Bladey  
Office of Administration  
Mail Stop OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Comment on proposed Integrated Action Plan to Modernize Digital Instrumentation and Controls Regulatory Infrastructure (Docket ID NRC-2016-0068)

**References:** (1) Draft *Integrated Action Plan to Modernize Digital Instrumentation and Controls Regulatory Infrastructure*, ML16075A466

As a professional in the nuclear licensing field, I'd like to encourage continued engagement with public stakeholders and resolution of concerns related to digital instrumentation and control system regulations and guidance. The review of digital instrumentation and control designs have proven to be a critical path for many applicants, with effects reaching into other review areas such as simulator development and initial operator training. A predictable regulatory structure is vital to prospective applicants for design approval.

I want to emphasize actions related to items 7, 9, 10, and 12 of Reference 1. I currently work with an advanced reactor developer and see firsthand the need for a clear and predictable regulatory structure for digital instrumentation and control, including cyber security. This includes standards and guidance documents that allow for the development and submission of appropriate technical bases, and to facilitate meaningful reviews. While the draft integrated action plan focuses near-term efforts in support of the operating fleet and incorporating modernization activities for existing plants, I encourage the U.S. Nuclear Regulatory Commission staff to ensure efforts in support of new plant designs are prioritized appropriately, as the conditions necessary for efficient design development are needed today.

Thank you for the opportunity to comment. If you have any questions or need any additional information, please contact me at tchapman@oklo.com or (202) 827-6787.

Sincerely,

*Travis A. Chapman*

cc: Mr. Todd Keene, NRC  
NRC Document Control Desk