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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-0006

Comment on FR Doc # 2016-07112

Submitter Information

Name: Jacob DeWitte

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General Comment

Oklo appreciates the opportunity to comment on this issue. Please see the attached document for our letter of comment.

Attachments

Oklo-NRC-201604-01 Comment DI&C IAP

SUNSI Review Complete

Template = ADM - 013

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Add= *T. Keene (STK1)*

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April 24, 2016

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

Subject: 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

Dear Ms. Bladey:

We have reviewed the subject draft plan in Reference 1 and appreciate the opportunity to comment.

We want to especially emphasize the importance of the activities in item 1, with regard to the adoption of a graded approach for the analysis methods or acceptance criteria, based on the safety consequence of a potential common cause failure (CCF). NRC development of guidance for considering CCF in context of safety significance will mean both considerably improved safety as well as regulatory efficiency. We are encouraged by this effort and by the NRC's prioritization of this effort as a near-term activity.

We are also supportive of the Commission's direction for the plan's guiding principles to include having performance-based rather than prescriptive requirements, creating technology neutral as well as tailorable requirements, and ensuring that the requirements and guidance should not pose an unnecessary impediment to advancement in nuclear applications of digital technology.

Oklo is developing an advanced reactor technology and intends to take advantage of modern digital instrumentation and control systems. As noted in Reference 1, such modern systems have great potential to improve reliability and reduce or eliminate concerns associated with older analog architectures. A clear and navigable regulatory structure for developing such modern systems is imperative to organizations like Oklo to provide robust solutions for the U.S. Nuclear Regulatory Commission staff to review.

Ms. Cindy Bladey

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In addition, we want to emphasize actions related to items 7, 9, and 12 of Reference 1. As a prospective applicant for a design review, like other stakeholders and potential applicants, Oklo will require an efficient, effective and consistent staff evaluation of licensing submittals. Confusion in the level of detail required in license applications and licensing technical reports, and the lack of a process to effectively and efficiently address updates to topical reports or design changes following safety evaluation, will needlessly prolong the licensing process and burden NRC resources. We urge the NRC to consider prioritizing some aspects in these efforts, as some improvements may be made in the near term while the overall long term task continues.

Lastly, we also want to highlight the statement in Reference 1 regarding topic 10: "In general, the current assessment approach does not credit the safety benefits offered by new design approaches and technology..." Similar to the above comments regarding Action Plan item 1, we support the NRC focus on these aspects and find the implementation of improved methods to evaluate or "credit" safety benefits critical to both the NRC mission as well as improving efficiency for license applications offering the new safety or design and technology features.

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

Sincerely,



Jacob DeWitte



Caroline Cochran

Sunnyvale, CA

cc: Mr. Todd Keene, NRC
Dr. Jennifer L. Uhle, NRO, NRC
Mr. Michael E. Mayfield, NRO/DEIAR, NRC
NRC Document Control Desk