

As of: 2/13/17 2:40 PM  
Received: February 08, 2017  
Status: Pending\_Post  
Tracking No. 1k1-8umc-bng6  
Comments Due: February 21, 2017  
Submission Type: Web

# PUBLIC SUBMISSION

**Docket:** NRC-2016-0270

Guidance for Implementation of 10 CFR 50.59, "Changes, Tests, and Experiments"

3

**Comment On:** NRC-2016-0270-0001

Draft Regulatory Guides: Changes, Tests, and Experiments

12/23/2016

**Document:** NRC-2016-0270-DRAFT-0005

Comment on FR Doc # 2016-30921

81FR 94275

RECEIVED

2017 FEB 13 PM 2:37

RULES OF PRACTICE

## Submitter Information

**Name:** Anonymous Anonymous

## General Comment

NEI 96-07 Rev 1, only discusses the regulatory requirements for in terms of 10 CFR 50.65. There are other regulatory requirements for maintenance that should be described in the RG, for example:

10 CFR 50 Appendix A States:

"...  
The development of these General Design Criteria is not yet complete. For example, some of the definitions need further amplification. Also, some of the specific design requirements for structures, systems, and components important to safety have not as yet been suitably defined. Their omission does not relieve any applicant from considering these matters in the design of a specific facility and satisfying the necessary safety requirements. These matters include:

(4) Consideration of the possibility of systematic, nonrandom, concurrent failures of redundant elements in the design of protection systems and reactivity control systems. (See Criteria 22, 24, 26, and 29.)

Criterion 22 Protection system independence. The protection system shall be designed to assure that the effects of natural phenomena, and of normal operating, maintenance, testing, and postulated accident conditions on redundant channels do not result in loss of the protection function, or shall be demonstrated to be acceptable on some other defined basis. Design techniques, such as functional diversity or diversity in component design and principles of operation, shall be used to the extent practical to prevent loss of the protection function."

Therefore the design (at least for protections systems) must include provisions to ensure maintenance does not result in "the possibility of systematic, nonrandom, concurrent failures of redundant elements."

SWSI Review Complete  
Template = ADM-013

E-RIDS = ADM-03  
Cell = B. Harris (bkh4)  
M. Orr (mof1)

Please include a regulatory position that states: Where a requirement such as the one quoted above exists, Changes to these provisions must be evaluated under 50.59.