

Alignment of NEI Documents for Use under 10 CFR 50.59

Digital I&C Integrated Action Plan – MP#2

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Key Messages

- Mapping between Draft NEI 96-07 Appendix D and NEI 16-16 is essential to continued review progress for MP#1B and MP#2
- Understanding how Draft NEI 96-07 Appendix D and NEI 16-16 will replace and improve upon NEI 01-01 (e.g. 12 Staff concerns)
- Understanding what will happen to the remaining information in NEI 01-01 currently not residing in Draft NEI 96-07 Appendix D and NEI 16-16

Mapping Between Appendix D and NEI 16-16

- What aspects of NEI 16-16 can be applied to Appendix D?
 - Screening guidance?
 - Evaluation guidance?
- Consistency of terminology
 - “CCF Susceptibility Analysis”
- Compatibility of technical information
 - Bounding concepts and methodologies
- Appendix D and NEI 16-16 are closely tied to together – It is essential that these relationships are clearly described and demonstrated to Staff

CCF Credibility/Likelihood Determinations

- **Draft NEI 16-16 Credibility Determinations (50.59s & LARs)**
 - CCF Not Credible (pg. 5)
 - CCF Credible & Beyond Design Basis (pg. 5)
 - CCF Credible & Within Design Basis (pg. 9)
 - **Draft Appendix D Credibility Determinations (50.59s only)**
 - CCF Not Credible (pg. D-24)
 - CCF Credible But Not Attributable (pg. D-27, D-35)
 - CCF Credible But Negligible (pg. D-29)
 - CCF Credible (pg. D-24)
 - **NEI 01-01 Likelihood Determinations (50.59s only)**
 - Not more than a minimal Increase in Likelihood of Malfunctions (pg. 4-16)
 - Likelihood of Failure is Sufficiently Low Likelihood (pg. 4-20)
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Summary of Concerns with NEI 16-16

- Staff provided comments on NEI 16-16 [Draft 1] (ADAMS Accession# [ML17072A142](#)) on March 13, 2017. Only two (#5 and #14) comments fully resolved in NEI 16-16 [Draft 2].
- Staff unclear on how the results from NEI 16-16 will be used for licensing (i.e., License Amendment Requests or 10 CFR 50.59 evaluations). NEI 16-16 comment resolution discussions will be delayed until this issue is resolved.
- Staff concerned that content in NEI 16-16 may not be consistent with content in NEI 96-07, Appendix D (e.g., use of the word “credible”).

Summary of Concerns with NEI 01-01

- Previously identified 12 Staff concerns in a letter to NEI dated November 05, 2013 (ADAMS Accession# ML13298A787)
- On June 15, 2016, NEI presented a summary table that individually mapped each staff concerns to a successor document to NEI 01-01 (ADAMS Accession# ML16166A338)
- Staff wants to ensure this framework is still up to date