

From: [Ken Scarola](#)
To: [Drake, Jason](#)
Cc: [Rahn, David](#); [Holonich, Joseph](#); [Morton, Wendell](#)
Subject: [External_Sender] Recommendations and Comments on Staff Documents Issued in Conjunction with April 20, 2017 Public Meeting on CCF RIS
Date: Friday, April 21, 2017 1:11:18 PM
Attachments: [Draft RIS to Clarify RIS 2002-22 Endorsement of NEI 01-01 for Public Meeting on 04-20-2017 Change Accepted_KS.docx](#)
[Qualitative Assessment Guidance for NEI 01-01_rev1 Changes Accepted for use with 04-20-2017 Public Meeting - Changes Accepted_KS.docx](#)

Jason,

I'm sending the files attached for Staff consideration regarding the documents made public by the staff for use in conjunction with the NRC public meeting held April 20, 2017.

There are two attachments:

1. My comments on the "Draft_RIS_to_Clarify_RIS_2002-22_Endorsement_of_NEI_01-01 for Public Meeting on 04-20-2017 Change Accepted".
2. My comments on the "Qualitative Assessment Guidance for NEI 01-01_rev1 Changes Accepted for use with 04-20-2017 Public Meeting --Changes Accepted".

In addition, in the MOP digital replacement example presented at the meeting, the attributes of low likelihood of a defect and divisional independence are used to conclude that a CCF is as unlikely as other potential sources of CCF, such as maintenance or calibration errors that are not considered in the FSAR (i.e., in essence the conclusion is that a CCF is not credible for the MOP application). But the SRM to SECY 93-087 uses these same two attributes (one qualitative, one deterministic) to conclude only that a CCF is sufficiently unlikely to be analyzed as a beyond design basis event, not to conclude that a CCF is not credible. I agree with the SRM to SECY 93-087, and maintain that to reach a CCF not credible conclusion additional deterministic design attributes are required, such as configuration differences to achieve non-concurrent triggers. What is the technical basis for changing the Staff's policy on this issue, and can a policy change be made in a RIS?

Thank you for considering this input for the RIS on CCF. I would be happy to discuss any of these comments.

Ken

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