

**From:** [Ken Scarola](#)  
**To:** [Drake, Jason](#)  
**Cc:** [Rahn, David](#); [Holonich, Joseph](#); [Morton, Wendell](#)  
**Subject:** [External\_Sender] RE: Recommendations and Comments on Staff Documents Issued in Conjunction with April 20, 2017 Public Meeting on CCF RIS  
**Date:** Friday, April 21, 2017 1:14:43 PM  
**Attachments:** [RIS Flow chart with KS comments.pdf](#)

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Jason,

I forgot to include one more attachment, which are my comments on the flow chart. I could not put this in the Word file. They are in the PDF file attached.

Ken

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Ken Scarola  
Nuclear Automation Engineering, LLC  
3672 Pine Tree Ln.  
Murrysville, PA 15668  
412-612-1192

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**From:** Ken Scarola [mailto:KenScarola@NuclearAutomation.com]  
**Sent:** Friday, April 21, 2017 1:10 PM  
**To:** 'jason.drake@nrc.gov' <jason.drake@nrc.gov>  
**Cc:** David Rahn (David.Rahn@nrc.gov) <David.Rahn@nrc.gov>; 'Joseph.Holonich@NRC.gov' <Joseph.Holonich@NRC.gov>; 'wendell.morton@nrc.gov' <wendell.morton@nrc.gov>  
**Subject:** Recommendations and Comments on Staff Documents Issued in Conjunction with April 20, 2017 Public Meeting on CCF RIS

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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Ken Scarola  
Nuclear Automation Engineering, LLC  
3672 Pine Tree Ln.  
Murrysville, PA 15668  
412-612-1192