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Clarification on Endorsement of Nuclear Energy Institute Guidance in Designing Digital Upgrades in Instrumentation and Control Systems

Comment On: NRC-2017-0154-0003

Clarification of Endorsement of Nuclear Energy Institute Guidance in Designing Digital Upgrades in Instrumentation and Control Systems; Extension of Comment Period on Draft Regulatory Issue Summary

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General Comment

The 50.59 rule (and associated guidance) is applicable to both Nuclear Power Plants (NPPs) and Non-power Productions and Utilization Facilities (NPUFs); however, the guidance is NPP centric. For example, 63_FR_56098 contains an overview description of the licensing process, and this description is very appropriate for NPPs. Certain aspects of this description are not very appropriate for NPUFs; therefore, certain guidance is also not very appropriate for NPUFs.

Please provide someplace:

- (1) a comparable description of the NPUF licensing process
- (2) a comparison of the similarities and differences in the licensing process of NPPs and NPUFs
- (3) specific guidance on how 50.59 guidance should be implemented for NPUFs, giving specific consideration to the differences in their licensing processes

SUNSI Review Complete

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