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Docket: NRC-2017-0154
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

Document: NRC-2017-0154-DRAFT-0007
Comment on FR Doc # 2017-16153

7

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Submitter Information

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General Comment

Likelihood Thresholds: It seems like the RIS implies there is one likelihood threshold, but in the FSAR (as updated) there are many likelihood thresholds, for example, NEI 96-07 Rev. 1 states:

"For most licensees, accidents and transients have been divided into categories based upon a qualitative assessment of frequency. For example, ANSI standards define the following categories for plant conditions for most PWRs as follows:

Normal Operations - Expected frequently or regularly in the course of power operation, refueling, maintenance or maneuvering

Incidents of Moderate Frequency - Any one incident expected per plant during a calendar year

Infrequent Incidents - Any one incident expected per plant during plant lifetime

Limiting Faults - Not expected to occur but could release significant amounts of radioactive material thus requiring protection by design"

Presumably the threshold value for "More then minimal increase in frequency" or not, would occur at a different numerical value for each category, and possible for different events in each category.

SUNSI Review Complete
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Please state explicitly in the RIS how these different thresholds in the FSAR (as updated) are addressed by the likelihood guidance in the RIS.