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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

Document: NRC-2017-0154-DRAFT-0009

Comment on FR Doc # 2017-16153

Submitter Information

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82FR 30913

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General Comment

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The RIS states:

"other CCF that are not considered in the UFSAR (e.g., design flaws, maintenance errors, calibration errors)."

This statement is misleading. There are many ways that the FSAR (as updated) addresses CCFs (e.g., through diversity and defense-in-depth); however, only some CCFs are addressed through explicit analysis in Chapter 15 (e.g., loss of feedwater).

Please replace with: "other CCFs that are not explicitly analyzed in Chapter 15 in the FSAR (as updated)". If that was what was meant. If there was another intended meaning, then please clarify (e.g., by deleting the parenthetical examples).

Note 1: Diversity and defense-in-depth are both techniques to address "unknown unknowns;" therefore, these CCFs cannot be described in the FSAR (as updated), but they are considered and addressed.

Note 2: There really are only a few things that are conscientiously not considered in the FSAR (e.g., primary vessel breach). There are other things that were just never thought of (only time will tell).

SUNSI Review Complete

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