

RULES AND DIRECTIVES  
BRANCH  
USNRC

2017

2017 AUG 17 AM 9: 24

As of: 8/17/17 9:11 AM  
Received: August 16, 2017  
Status: Pending\_Post  
Tracking No. 1k1-8y4j-ycbd  
Comments Due: August 16, 2017  
Submission Type: Web

# PUBLIC SUBMISSION

RECEIVED

**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-0010

Comment on FR Doc # 2017-16153

## Submitter Information

7/3/2017  
82FR 30913

**Name:** Daniel Cronin

110

## General Comment

August 16, 2017

Re: Personal Comments of Daniel Cronin on the NRC's Clarification on Endorsement of NEI 01-01 by Proposed RIS 2017-XX

Thank you for the opportunity to comment on the draft RIS 2017-XX dated June 27, 2017.

I endorse the comments of the NEI and offer the following additional comments for your consideration:

### ADDRESSEES Section

The RIS should be revised to include non-power reactor licensees as addressees. During the May 25, 2017 public meeting there was discussion of the importance of including non-power reactor licensees in this proposed RIS and an understanding that the exclusion of non-power reactors from the text of RIS 2002-22 was an oversight.

Related guidance for licensing digital upgrades via 10 CFR 50.59 is already incorporated by reference in NRC produced non-power reactor guidance. EPRI TR-102348 and Generic Letter 95-02 were referenced in NUREG-1537, Guidelines for Preparing and Reviewing Applications for the Licensing of Non-Power Reactors. Also, though they followed after issuance of NUREG-1537 in 1996, the revision to EPRI TR-102348 (NEI 01-01) and RIS 2002-22 are being used by the non-power NRC staff and licensees.

Additionally, NEI 96-07 and associated RG 1.187 are applicable and in use by non-power reactor licensees

SUNEL Review Complete  
Template = ADM-013

E-RFDS = ADM-03  
Add = B. Harris (bKH4) J. Drake (5x D23)  
T. SoVan (Txg1)

and NRC staff.

It's important that the error of excluding non-power reactor licensees from the text of RIS 2002-22 not be carried forward into this proposed RIS. Non-power reactor licensees rely heavily on 10 CFR 50.59 to operate and maintain our facilities with DI&C usage increasing as viable analog solutions become fewer and fewer.

Section 5.2, Safety Significance of SSCs and Documentation of Evidence

The discussion of considerations on safety significance of SSCs should be expanded to address identification of SSCs or systems important-to-safety, risk significant systems, and grading by safety or risk significance.

Thank you again for the opportunity to provide comments on the proposed RIS. I'm hopeful you'll give my comments your thoughtful consideration.

Sincerely,

Daniel J. Cronin  
dcronin@ufl.edu