

October 2, 2017

MEMORANDUM TO: Dennis C. Morey, Chief
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Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Lynnea E. Wilkins, Project Manager /RA/
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JULY 13, 2017, MEETING ON DIGITAL
INSTRUMENTATION AND CONTROL INTEGRATED ACTION PLAN
MODERNIZATION PLAN #4

On July 13, 2017, U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from the Nuclear Energy Institute (NEI) to continue discussions of Modernization Plan #4 (MP #4) of the Integrated Action Plan to Modernize Digital Instrumentation and Controls (DI&C) Regulatory Infrastructure (Agencywide Documents Access and Management System (ADAMS) Package Accession Number ML17102B296). The purpose of the meeting was to discuss proposed approaches and plans to revise current guidance for license amendments that include DI&C. The discussions focused on refining the tactical scope of the activity, the plan to produce revised guidance, and discuss specific sections of the guidance targeted for revision. Information related to the meeting and discussed in this summary can be found in the ADAMS Package Accession Number ML17243A426.

Industry and staff discussed industry's written response to NRC requests for clarification (ADAMS Accession Number ML17243A429), which were provided at the June 8, 2017 public meeting. The discussions included:

- "Elimination of duplication" within the licensee response referred to duplication of work activities between licensee activities and NRC activities (not within NRC activities);
- Whether and to what degree the clarified duplication exists between current licensee and NRC activities;
- The need for a mapping of DI&C-Interim Staff Guidance (ISG)-06 elements (including Branch Technical Position (BTP) 7-14) of the current licensing process to licensee controlled activities under license mandated Quality Assurance (QA) program (including subordinate processes and procedures);
- Identification of any gaps – to be justified or otherwise resolved – to align with industry's proposed *Alternative Tier 1*, which was previously reflected in industry's proposed Enclosure B at the June 8, 2017, public meeting but without an accompanying cross-walk of missing information to licensee QA programs;

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- Any scope for “cyber security” should only reflect secure development and operational environment scope in DI&C-ISG-06, D.12.4.1;
- Whether all licensees currently and consistently perform activities to ensure their vendors implement a rigorous lifecycle processes to appropriate work products;
- Intention to eliminate the LAR submittal template from DI&C-ISG-06 and include an appropriate template(s) in NEI 06-02, “License Amendment Request Guidelines”

Industry and staff discussed the proposed project plan (ADAMS Accession No. ML17243A427) to produce the DI&C-ISG-06 revision. The proposed project plan outlines proposed activities and contains two major milestones:

- Availability of a completed DRAFT DI&C-ISG-06 revision in early 2018; and,
- Availability of the final DI&C-ISG-06 revision, targeting late 2018.

These discussions included a summary of the overall approach and included the NRC process that applies to issuance of an ISG revision. The process to issue an ISG revision is provided in Office Instruction LIC-508, “Development, Issuance, and Closure of Interim Staff Guidance for the Office of Reactor Regulation.” To support the proposed approach and further align project expectations, the project plan will be augmented to include milestones associated with the LIC-508 process.

Industry and staff discussed the proposed outline of DI&C-ISG-06 revision (ADAMS Accession Number ML17243A430). These discussions included aligning the project plan with the consensus outline for the DI&C-ISG-06 revision. To support the proposed approach, the project plan will be augmented to include milestones for exchange of information prior to public meetings. The project plan will identify information exchanges 10 business days prior to the public meeting and allow 5 business days for review and return of observations and comments.

Industry and staff discussed preliminarily drafted sections (A and B, D.9 and D.10; ADAMS Accession Numbers ML17244A028 and ML17243A428, respectively) of the proposed DI&C-ISG-06 revision. The existing content and ideas for drafting the sections were discussed during the June 28, 2017, public meeting. Discussions included the intended applicability of the proposed DI&C-ISG-06 revision to new reactors and SMRs (versus only to operating reactors). These discussions involved consideration of modification processes presently used on new but not yet operating reactors, as well as how the revision, as proposed, might only point to the Standard Review Plan (SRP) to the exclusion of a small modular reactor (SMR) design-specific review standard (DSRS). Industry will clarify its proposed scope of applicability to address these considerations.

Industry and staff discussed the scope and content of current DI&C-ISG-06 sections (D.7, D.11, and D.12) to support creation of their preliminary drafts for discussion at the next public meeting.

Actions identified during the meeting and intended for closure at the next public meeting, August 17, 2017, are:

- 1) NRC/NEI – Finalize dates (identify and propose alternatives) for subsequent (monthly) public meetings through January 2018.
- 2) NRC/NEI – Schedule periodic calls (bi-weekly) in support of DI&C-ISG-06 revision activities.

- 3) NEI – Provide an update on progress to create an explicit mapping of DI&C ISG 06 elements (including BTP 7-14) of the current licensing process to licensee controlled activities under license mandated QA program (including subordinate processes and procedures), including identification of any gaps-to be justified or otherwise resolved.
- 4) NEI – Provide industry clarification of the applicability of the proposed DI&C-ISG-06 revision to new reactors and SMRs.
- 5) NRC – Further clarify LIC-508 process requirements to refine high-level milestones for use in the project plan.
- 6) NRC – Identify and communicate to NEI when early input might be sought from the NRC Advisory Committee on Reactor Safeguards via an informal presentation to support evaluation of potential material effects on the proposed path.
- 7) NEI – Identify and communicate to the NRC when a pre-application meeting would be planned to occur for the targeted application of industry's proposed *Alternative Tier 1* approach for inclusion of the milestone within the project plan.
- 8) NRC – Draft sections D.12
- 9) NEI – Draft sections D.7 and D.11
- 10) NRC – Update preliminary Section A and B draft based on meeting discussions.

D. Morey

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MODERNIZATION PLAN #4 DATED: OCTOBER 2, 2017

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ADAMS Accession Nos.: Pkg. (ML17243A426); Summary (ML17244A030); *via e-mail NRC-001

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