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Cc: Holonich, Joseph
Subject: CCF Definition and Notes in NEI 16-16 [Draft 2]
Date: Thursday, November 09, 2017 10:27:00 AM

Vic,

We have reviewed the Common Cause Failure definition and notes you provided for inclusion in NEI 16-16.

The definition and notes proposed for future drafts of NEI 16-16 are:

CCF: "Loss of function to multiple structures, systems or components due to a shared root cause" (IEEE Std. 603-2009).

For this guideline, the following notes apply: 1) Loss of function means a malfunction of multiple SSCs caused by a specific I&C failure source. 2) Shared root cause is limited to I&C failure sources, including single random hardware component failure, an environmental disturbance, a software design defect, and a human error.

The clarifications provided during the November 02, 2017 public meeting were helpful in addressing our concerns. NRC agrees with maintaining the definition selected from IEEE Std. 603-2009 and clarifying the scope of loss of function and shared root causes with respect to scope of this guidance, with the following adjustments:

- Replace "For this guideline, the following notes apply " with "The scope and use of this guideline is limited by the following notes:"
- Place these notes in the body of NEI 16-16, such as Section 1.2 or 3.1, instead of in the Definitions (Section 2).
- *Change note 1 to: "Loss of function means undesirable behaviors (e.g., spurious actuations, failure to perform on demand, failure to maintain normal operating conditions, etc.) of multiple SSCs caused by an I&C failure source considered in this guideline."*

This e-mail will be placed in ADAMS and placed in the package for the November 2 meeting.

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