

NRR-DMPSPEm Resource

From: FREGONESE, Victor <vxf@nei.org>
Sent: Tuesday, August 15, 2017 1:51 PM
To: Morton, Wendell
Cc: Rahn, David
Subject: [External_Sender] RIS Update

Here is my brief summary of the way I see the comments.

This is not an official NEI position or commentary, just provided to give you a heads up. Hope this helps you to decipher them when you get them.

- 31 of the formal comments are repeats from the previous, draft comments we sent
- We received a lot of comments and suggestions from the reviewers on the RIS and Attachment. We tried to provide suggested changes, edits, and rewording whenever possible, and to provide a basis for our comment or concern.
- I don't think that there is anything that you have not heard from the industry before, though some of the comments do reflect items that may have been discussed in early meetings. An example of this were some comments we received about the relationship of the RIS to CCF Policy and BTP 7-19. The one item I would consider really new, that came up very late (was briefly mentioned in the last meeting) was that the non-power reactor community wanted to understand how/if this RIS applies to them, so you will see a few comments from them. I would still say that the 2 key areas to be further discussed in detail are the applicability of the RIS and Attachment to non-safety related upgrades, and the "plant level" malfunction position.

The comments fall into the following general categories (just a quick way to bucket them):

E-Editorial, Clarification, Descriptive Information, Wording, Format
FT - Flowchart and Tables
S-Scope, applicability
D- Definitions, terms
QC -Quality, codes and Standards
B - Regulatory Basis
R-Use of new RIS with old RIS and NEI 01-01

There are about a 100 comments total, which include the previous 31 we sent. I tried to eliminate repeat comments, but some do overlap and cover more than one point. May sound like a lot, but once you get through the editorial and table/flowchart ones, I believe we are still down to a handful of key issues that need to be resolved, as discussed in the last meeting.

Breakdown as I see them:

E – 37
FT – 23
S - 17
D – 7
QC – 5
B – 11
R – 4

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From: Morton, Wendell [<mailto:Wendell.Morton@nrc.gov>]
Sent: Tuesday, August 15, 2017 10:55 AM
To: FREGONESE, Victor
Cc: Rahn, David
Subject: RE: RE: RIS Update

Hi Vic,

Just checking in regarding a few items before you guys complete your work:

- Regarding the discussion in the August 2nd workshop, NEI expressed concerns that you would prefer to Criterion VI discussion to be settled or clarified in the RIS supplement. We want to encourage you to provide that as a formal public comment in the package you plan to submit. We'd also encourage you to provide any other comments you had from the public meetings into your formal package as well.
- Do you believe you'll be able to submit your comments package prior to the upcoming deadline?

Wendell

From: FREGONESE, Victor [<mailto:vxf@nei.org>]
Sent: Monday, August 14, 2017 4:02 PM
To: Rahn, David <David.Rahn@nrc.gov>
Cc: Morton, Wendell <Wendell.Morton@nrc.gov>
Subject: [External_Sender] RE: RIS Update

We received a lot of good input. The majority of the comments are editorial/wording/clarification/format/descriptive information suggestions, or on the flowchart and tables.

I will send you a better summary tomorrow am

Vic Fregonese

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From: Rahn, David [<mailto:David.Rahn@nrc.gov>]
Sent: Monday, August 14, 2017 12:47 PM
To: FREGONESE, Victor
Cc: Morton, Wendell
Subject: RE: RIS Update

Thanks for the update!

From: FREGONESE, Victor [<mailto:vmf@nei.org>]
Sent: Monday, August 14, 2017 11:46 AM
To: Morton, Wendell <Wendell.Morton@nrc.gov>; Rahn, David <David.Rahn@nrc.gov>
Subject: [External_Sender] RIS Update

Comments are in final review at NEI this morning.

Should have to you tomorrow first thing. Will keep you posted

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Email Number: 186

Mail Envelope Properties (41207040FCA6A84984074E806C73D73EE1FDCF)

Subject: [External_Sender] RIS Update
Sent Date: 8/15/2017 1:51:13 PM
Received Date: 8/15/2017 1:51:32 PM
From: FREGONESE, Victor

Created By: vxf@nei.org

Recipients:
"Rahn, David" <David.Rahn@nrc.gov>
Tracking Status: None
"Morton, Wendell" <Wendell.Morton@nrc.gov>
Tracking Status: None

Post Office: mbx023-e1-nj-2.exch023.domain.local

Files	Size	Date & Time
MESSAGE	8055	8/15/2017 1:51:32 PM

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