

# PUBLIC SUBMISSION

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**Docket:** NRC-2017-0237

Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants

**Comment On:** NRC-2017-0237-0001

Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants; Request for Comment on Draft Regulatory Guide

**Document:** NRC-2017-0237-DRAFT-0008

Comment on FR Doc # 2017-27661

## Submitter Information

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## General Comment

The adoption of IEEE 497-2016 as a new revision of Reg Guide 1.97 is appropriate as the standard is an international consensus standard having now not only been published by IEEE but also having been directly adopted by IEC as IEC 63147:2017.

The following regulatory positions should be reconsidered prior to issuance of the revision:

C.4. The clarification provided in this regulatory position is unnecessary because the terms "sufficient range" and "appropriate margin" add nothing without defining what is "sufficient" and "appropriate".

C.6. This clarification is unnecessary as implementation of the design criteria in Clause 6 will guide the user to the appropriate number of points necessary to characterize the variable.

⑦  
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SUNSI Review Complete  
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 Add = Pongy Chung (PCC3)  
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