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framatome

February 23, 2018
NRC:18:008

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Office of Administration
Mail Stop: OWFN-12H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Comments on Draft Regulatory Guide (DG) DG-1335, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants"

- Ref. 1: Federal Register, Volume 82, No. 246, "Nuclear Regulatory Commission [NRC-2017-0237], 'Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants'," p. 61043, December 26, 2017.
- Ref. 2: U.S. Nuclear Regulatory Commission Draft Regulatory Guide DG-1335, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants," December 2017.

In Reference 1, the NRC issued draft Regulatory Guide (DG), "DG-1335, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants" for public comment. This guide (Reference 2) is proposed revision 5 of Regulatory Guide (RG) 1.97 and describes an approach that is acceptable to the staff of the NRC to meet regulatory requirements for instrumentation to monitor accidents in nuclear power plants.

Framatome Inc. (Framatome, formerly AREVA Inc.) requests that the comments identified in Attachment 1 of this letter be addressed prior to release of RG 1.97.

If you have any questions related to this information, please contact Mr. Victor Fregonese by telephone at (704) 953-4544 or by e-mail at Victor.Fregonese@framatome.com.

Sincerely,



Gary Peters, Director
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Enclosure

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SUNSI Review Complete
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Add= Pongchung (PCC3)
Stephen Burton (SXB3)

Attachment 1

No.	Document Page/Section	Comment	Suggested Resolution
1	Section C.7, Page 10	This section states the following: <i>"The design of instrumentation should incorporate diversity and defense-in-depth as part of addressing common cause failures."</i>	Provide the regulatory basis (GDC, Regulation, Regulatory Guide, CFR reference) for this statement. Do not cite "guidance."
2	Section C.7, Page 10	This section discusses the applicability of IEEE-379-2016 and IEEE-603-2009, and directs the applicant to verify the applicability of these standards. The NRC has not formally endorsed these standards. This makes it difficult, or impossible for an applicant to determine what would be an acceptable interpretation of the requirements contained in those standards.	Remove the reference to IEEE and other standards not endorsed by the NRC, or clearly state they are not endorsed.
3	Section C.7, Page 10	<ul style="list-style-type: none"> • This section refers to BTP 7-19 and Diversity and Defense-in-Depth guidance. It is not clear how, or if, this applies to Accident Monitoring Systems, and what the regulatory basis is. • The position described in this Draft Regulatory Guide is not consistent with the SRM on SECY-93-087, Item 18, II.Q. • BTP 7-19 and the SRM are not an adequate regulatory basis for requiring diversity in accident monitoring instrumentation. • Another example is the cited NRC Order EA-12-051, which contains requirements for Spent Fuel Pool Level Instrumentation. This order does not require diversity or consideration of common cause failure. 	Revise the draft regulatory guide to be consistent with current regulations and regulatory guidance.
4	Section C.7, Page 10	The common cause failure position in this document is not consistent with on-going NRC work that is being pursued as part of the NRC I&C Integrated Action Plan (IAP), Modernization Plan MP1.	Hold the issue of the Regulatory Guide until such time it can be harmonized with the results of the MP1 work.

bcc: NRC:18:008
T Point: T4.12.2
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