

## NRR-DMPSPeM Resource

---

**From:** HANSON, Jerud <jeh@nei.org>  
**Sent:** Thursday, May 31, 2018 12:48 PM  
**To:** Govan, Tekia  
**Cc:** Benner, Eric; HANSON, Jerud  
**Subject:** [External\_Sender] RE: RIS Status  
**Attachments:** May 23 Public Meeting NRC-Industry Interpretations.docx

Thanks Tekia!

Provided for your consideration as part of the meeting minutes for the May 23<sup>rd</sup> public meeting are our interpretation of the clarifications. See attached.

Jerud

---

**From:** Govan, Tekia [<mailto:Tekia.Govan@nrc.gov>]  
**Sent:** Thursday, May 31, 2018 12:16 PM  
**To:** HANSON, Jerud  
**Cc:** Benner, Eric  
**Subject:** RE: RIS Status

Jerud:

Your timing is impeccable, as the Digital I&C RIS has just been issued. It is now publically available in ADAMS under accession number ML18143B633. Attached is a PDF of the document.

Thanks  
Tekia

---

**From:** HANSON, Jerud [<mailto:jeh@nei.org>]  
**Sent:** Thursday, May 31, 2018 11:04 AM  
**To:** Govan, Tekia <[Tekia.Govan@nrc.gov](mailto:Tekia.Govan@nrc.gov)>  
**Cc:** Benner, Eric <[Eric.Benner@nrc.gov](mailto:Eric.Benner@nrc.gov)>  
**Subject:** [External\_Sender] RIS Status

Tekia,

Is the RIS expected to go out today?

**Jerud E. Hanson** | *Sr. Project Manager,*  
*Life Extension & New Technology*  
1201 F Street, NW, Suite 1100 | Washington, DC 20004  
P: 202.739.8053 M: 202.497.2051  
[nei.org](http://nei.org)

*This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.*

---

Sent through [www.intermedia.com](http://www.intermedia.com)

*This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.*

---

Sent through [www.intermedia.com](http://www.intermedia.com)

**Hearing Identifier:** NRR\_DMPS  
**Email Number:** 405

**Mail Envelope Properties** (1290D5881ECCFA4FBF93A2D70AC2290681FCC299)

**Subject:** [External\_Sender] RE: RIS Status  
**Sent Date:** 5/31/2018 12:48:11 PM  
**Received Date:** 5/31/2018 12:48:25 PM  
**From:** HANSON, Jerud

**Created By:** jeh@nei.org

**Recipients:**

"Benner, Eric" <Eric.Benner@nrc.gov>  
Tracking Status: None  
"HANSON, Jerud" <jeh@nei.org>  
Tracking Status: None  
"Govan, Tekia" <Tekia.Govan@nrc.gov>  
Tracking Status: None

**Post Office:** MBX023-E2-VA-1.EXCH023.DOMAIN.LOCAL

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3381	5/31/2018 12:48:25 PM
May 23 Public Meeting NRC-Industry Interpretations.docx		17191

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

NRC and industry agreed upon interpretations of RIS 2002-22, Supplement 1 wording for inclusion within the May 23, 2018 RIS Public Meeting Minutes:

1. Unless specifically noted, guidance provided in the RIS Supplement applies to safety related activities. No new requirements for non-safety related activities are established within the RIS Supplement.
2. Intent Section, Page 2 of 5 states: "This RIS supplement is not directed toward digital I&C replacements of the reactor protection system, the engineered safety features actuation system, or modification/replacement of the internal logic portions of these systems (e.g., voting logic, bistable inputs, and signal conditioning/processing) ..." The intent of this statement is that licensees should not use the RIS Supplement for activities that implement a complete analog-to-digital replacement of the reactor protection or engineered safety features actuation systems (RPS/ESFAS) or activities that change the RPS/ESFAS internal actuation logic.
3. The term "operational hazards" used within the RIS Supplement has no unique or specific meaning and simply refers to hazards in a general sense.
4. NRC and industry agreed that, although potentially useful, a licensee is not required to document specific design features or environmental data when collecting operating experience (OE) as part of a qualitative assessment as this information is not typically available. If placing more emphasis on OE in qualitative assessment to compensate for weak design attributes or design process quality, then it may be necessary to collect additional OE data such as specific design features.
5. The RIS Supplement Engineering Evaluation/Failure Analysis section does not introduce any additional requirements beyond that already specified within a licensee's quality assurance program and associated administrative procedures. When the RIS Supplement mentions "failure analysis", the term is being used in the plain English context and does not necessarily mean a formal analysis. Depending on the project scope and complexity, a failure analysis could simply consist of a short statement in the qualitative assessment. The overall intent of the failure analysis section is to prompt licensees to consider potential digital failure mechanisms and to document them accordingly within the qualitative assessment.
6. The interpretation of the phrase "future plant changes" as used in Section 4.0 of the RIS Supplement is that adequate documentation should exist in an engineering change package such that an engineer making changes to the same SSC sometime in the future will not inadvertently eliminate or invalidate a given design attribute that was used to eliminate or minimize a particular hazard.
7. The RIS Supplement does not require formal documentation of software and configuration development tools when developing a failure analysis for a given activity. A design engineer should be cognizant of all potential pathways for introduction of CCF and there may be instances where software and configuration development tools may be a potential contributor to CCF. Proper testing may significantly reduce or eliminate the potential for software and configuration development tools as a contributor to CCF.

