



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 22, 2018

MEMORANDUM TO: Dennis C. Morey, Chief
Licensing Processes Branch
Division of Licensing Projects
Office of Nuclear Reactor Regulation

FROM: Joseph A. Golla, Project Manager */RA/*
Licensing Processes Branch
Division of Licensing Projects
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC PHONE CALL ON SEPTEMBER 19,
2018, WITH THE NUCLEAR ENERGY INSTITUTE REGARDING
DISPOSITION OF COMMENTS RECEIVED ON DRAFT ISG-06

On September 19, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff held a public phone call with the Nuclear Energy Institute (NEI) and other stakeholders. The purpose of the call was to discuss with NEI, the NRC's intended disposition of its comments regarding the draft ISG-06, Rev. 2, which had been posted for a thirty day public comment period in the Federal Register. The comment period had closed on September 6, 2018.

NEI had formally submitted fourteen comments considered to be of a substantive nature in response to the request for public comments. These may be viewed by the public on the U.S. NRC Agencywide Documents Access and Management System (ADAMS) at Accession No. ML18274A003. NEI also transmitted to the NRC a set of clarification comments for the staff's consideration. This submittal may be viewed at ADAMS Accession No. ML18260A037. Additionally, Entergy submitted a comment (ADAMS Accession No. ML18255A038) and a member of the public sent in a comment that was out of scope.

During the phone call, NRC staff discussed with representatives of NEI the staff's intended disposition of selected comments. The staff also discussed a comment received from Entergy. Below are some of the proposed comment dispositions discussed by the NRC staff:

CONTACT: Joseph A. Golla, NRR/DLP
301-415-1002

Comment No. 1: The staff will revise Section B to clarify the intent of the sentence, as follows:

“Where a licensee’s modification design references (i.e., is based on) an NRC-approved platform topical report...”

Comment No. 2: The staff will revise Section C to move the text in bullet ‘a’ to the sentence above. The remaining bullets will be renamed ‘a’ and ‘b’. The staff will revise the new bullet ‘b’ by deleting “in compliance with specific license conditions.”

Comment No. 3: The staff will revise Section C.1 to clarify the intent of the sentence. The revised sentence will read as follows:

“In Enclosure B, the Tier 1 column (1) shows an example of the information to be provided in support of a Tier 1 review.”

Comment No. 4: The staff will revise Section C.2 to clarify that the information to be provided by the licensee, as identified in Enclosure B, is dependent on the type of modification. The revised sentence will read as follows:

“Accordingly, the reviewer should verify that the information identified in Enclosure B, as applicable, is included as part of the application submittal.”

Comment No. 5 and Entergy Comment No. 1: Industry explained that the ISG repeats the term “license conditions” and that it may seem that there is a predisposition for using license conditions. The staff stated that they will evaluate where in the ISG the term “license condition” is used, and if it is really needed in the context of those sections.

The staff agreed with the intent of the comments to not paraphrase or duplicate the guidance in NRR Office Instruction LIC-101. The staff explained that under the Alternate Review Process, a license condition would be the most common way of escalating a licensee commitment, and that LIC-101 provides guidance for those licensee commitments that do not warrant a license condition. The staff explained that there is a high bar of safety or regulatory significance needed before a licensee commitment becomes a license condition. The staff will make changes to the ISG to make the language consistent with LIC-101.

Comment No. 6: The staff will revise Section C.2.1. The revised sentence will read as follows:

“When reviewing the information described in Figure B.1 (e.g., system architecture, equipment qualification), the NRC staff should credit, to the extent practicable, the results of previous topical evaluations and relevant precedents that are similar and reference the same approved topical report(s).”

Comment No. 7: The staff will revise Section C.2.1. The revised sentence will read as follows:

“This information can be derived from a variety of documents including conceptual design, system requirements, hardware requirements, software requirements, and human-system interface requirements, each of which may be considered as providing sufficient “system design” information in the context of the Alternate Review Process.”

Comment No. 8: The staff agrees with the intent of the comments and will revise Section C.2.1 accordingly, although the final language has not been determined yet.

Comment No. 9: The staff will revise Figure C.2. The revised block will read as follows:

“Detailed Design Completion, Implementation, and FAT.”

Comment No. 10: The staff agrees with the intent of the comments and will revise Section C.2.2 accordingly, although the final language has not been determined yet.

Comment No. 11: The staff will revise Section C.2.2 as proposed in the comment, but will remove the words “the licensee”. The revised item 2.c will read as follows:

“The extent to which the vendor of the NRC-approved topical report, or a supplier with an approved 10 CFR Part 50, Appendix B program, commits to performing detailed software design, implementation, and testing in accordance with the approved topical report.”

Comment No. 12: The staff will revise Section C.3.2.2 as proposed in the comment.

Comment No. 13: The staff will revise Section D.2.3.3.1 to make the sentence applicable to both processes. The sentence will be revised as follows:

“This section uses the definitions from the International Electrotechnical Commission Std. 61513, “Nuclear Plants—Instrumentation and Control Important to Safety—General Requirements for Systems,” paraphrased below to fit modifying and replacing existing systems, rather than designing new systems.”

Comment No. 14: The staff will revise Section D.2.3.1.d, and Section D.2.3.3.1. The revised items will read as follows:

“Functionality—if there are TS setpoint changes, include input/output ranges and setpoints (for trip functions, the documentation defines the margins between setpoints and allowable values (including all applicable uncertainties))”

Clarification Comment on Page 6: The staff disagrees with the proposed change because the original language conveys the intended message appropriately.

Clarification Comment on Page 9: The staff disagrees with the proposed change because the reference to Section C.2.1 occurs five paragraphs before Section C.2.1.

Clarification Comment on Page 11: During the September 11, 2018, public comment clarification call, the staff and industry discussed how a future version of NQA-1 could change from the 2015 version, and how the ISG has referenced specific version of industry and NRC guidance documents in other places. During that call, NEI informed the staff that this comment may be ignored. The staff agreed with this, therefore, the comment will not be incorporated.

Clarification Comment on Page 15(1): The staff already considered this when developing the version that was issued for public comments. Although the sentence is applicable to both review processes, moving it to the Section C.3.2 would list the activities out of order. Therefore, the comment will not be incorporated.

Clarification Comment on Page 15(2): The fifth paragraph provides important guidance to the staff that is not covered in the following paragraph. Therefore, the comment will not be incorporated.

Clarification Comment on Page 16(2): The language regarding audits is not covered in Section C.3.2. Adding it to Section C.3.2 places the information out of order, before the process-specific review information. Therefore, the comment will not be incorporated.

Clarification Comment on Pages 15 and 17: The same sentence already exists for the Tier 1, 2, and 3 Review Process in Section C.3.2.1.1. Therefore, the comment will not be incorporated.

Also discussed were initial plans for an upcoming workshop in November on inspection of DI&C installations. The workshop will take place on November 15, in the afternoon, and should last about 4 hours. A workshop planning meeting will take place on October 9 to discuss the workshop agenda and outcomes.

No comments or questions were received on the call by members of the public.

Enclosure:
Attendees List

SUBJECT: SUMMARY OF PUBLIC PHONE CALL ON SEPTEMBER 19, 2018, WITH THE
NUCLEAR ENERGY INSTITUTE REGARDING DISPOSITION OF COMMENTS
RECEIVED ON DRAFT ISG-06 DATED OCTOBER 22, 2018

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ADAMS Accession Nos.:**PKG ML18275A044****Summary ML18275A042****Notice ML18243A004*****concurred via e-mail****NRC-001**

OFFICE	NRR/DLP/PLPB/PM	NRR/DLP/PLPB/BC	NRR/DLP/PLPB/PM
NAME	JGolla	DMorey	JGolla
DATE	10/17/2018	10/18/2018	10/22/2018

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NRC Public Phone Call Attendance

September 11, 2018

Pareez Golub	Excel Services
Warren Odess-Gillett	NEI
David Herrell	MPR Associates
John Schrage	Entergy
Wesley Frewin	NextEra
David Hooten	Imperia Engineering Partners
Frank Novak	GEH
Samir Darbali	NRC
Mike Waters	NRC
Rich Stattel	NRC
Deanna Zhang	NRC
Booma Venkataraman	NRC
Eric Benner	NRC
Joe Golla	NRC

Enclosure