

ITEM #	APPENDIX D SECTION	NRC COMMENT IDENTIFIER(S)	TYPE OF NRC COMMENT: C = Correction E = Enhancement	INDUSTRY RESPONSE
<p><b><u>COLOR KEY:</u></b></p> <p><b>BLUE</b> = Unclear comment. NRC clarification needed to disposition.</p> <p><b>GREEN</b> = NRC comment will be incorporated.</p> <p><b>YELLOW</b> = NRC comment will be addressed, but not "exactly" as suggested. A compromise between the NRC and the Industry will be necessary.</p> <p><b>RED</b> = Apparent conflict with regulatory infrastructure; NRC/NEI alignment on what needs to change and why it is necessary.</p> <p><b><u>OTHER:</u></b></p> <p>** = Significant change to the previously developed Appendix D process/guidance</p>				
A	General	1	N/A	See Item #1.
B	General	2	N/A	Addressed in Item #7.
C	General	3	N/A	Addressed in Items #13 & #40.
D	General	4	N/A	See Item #28a.
E	General	5	N/A	See Item #70.
1	Executive Summary	A1	C	<p>NRC needs to identify the additional part(s) of the Supplement that need to be incorporated.</p> <p>Supplement 1 to RIS 2002-22 is primarily a guidance document for technical guidance (i.e., the preparation of qualitative assessments and the topics that should be considered therein), not licensing (i.e., 50.59) guidance. Only the guidance in Section 2.2 is related to 50.59, which has already been incorporated</p>

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				into Section 4.3 of Appendix D.
2	1.1	A2	C	To be incorporated
3	1.2	A3	E	To be incorporated
4	1.2	A4	E	Suggested addition not pertinent, but final sentence to be removed.
<b>SCREEN PHASE COMMENTS</b>				
5	4.2	A5	C	The purpose of the CAUTION is to ensure the user understands that the guidance in the main body of NEI 96-07 still applies and/or must be considered. Suggested text will be added.
6	4.2	A6	C	To be incorporated
7	4.2	A7	C	The conclusions in the examples will be changed to reflect the phrase "does not screen in for the aspect or topic within the section/subsection" (or equivalent) in place of "not adverse."
8	4.2	A8	C	See Item #28a.
9	4.2.1.1	A9	E	Subject text to be <i>removed</i> , not <i>moved</i> .
10	4.2.1.1	A10	C	Subject text to be removed.
11	4.2.1.1	A11	C	To be incorporated
12**	4.2.1.1	A12	C	The suggested language will need to be adjusted to acknowledge that the "engineering evaluation" in this case would be a <i>qualitative assessment</i> (as described in Supplement 1 to RIS 2002-22), which is used in the Evaluation phase, not in the Screen phase.

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				The information in the subsequent paragraph is related and perhaps the paragraphs could be combined.
13	4.2.1.1	A13	C	In the Screen section, "engineering evaluations" will be changed to "engineering/technical information supporting the change." Note that the term "qualitative assessment" and its process do not apply in the Screen phase, but do apply in the Evaluation phase (as identified in Supplement 1 to RIS 2002-22).
14	4.2.1.1	A14	C	Suggested wording to be slightly modified and added as an example at the end of the sentence.
15	4.2.1.1	A15	C	Will add "e.g." at the beginning of the items within the parentheses.
16	Example 4-1	A16	C	Parenthetical phrase to be removed.
17	Example 4-1	A17	C	Identified text will be removed and two sentences created.
18	Example 4-1	A18	C	Parenthetical phrase to be removed.
19	Example 4-2	A19	C	Although the observation stated in the NRC comment could be true, this example does not represent an actual plant or an actual licensing basis of a facility. This example simply illustrates the case in which there are "no design functions."

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				Add, " <u>In this case, the licensee has determined</u> there are NO design functions..."
20	Example 4-2	A20	C	See response to item #19.
21	Example 4-3	A21	C	Example 4-3 will be reworked to address the new approach proposed in addressing Item #12.
22	4.2.1.1	A22	E	NRC needs to identify a specific type of "combination" not covered by current examples.
23	4.2.1.1	A23	C	The current sentence will be replaced with the associated guidance from NEI 01-01, Section 4.3.3, four bullets at the end of the 1st paragraph.
24	Example 4-4	A24	C	Erroneous conclusion basis will be corrected.
25a	Example 4-4	A25	C	<p>(1) According to the currently endorsed guidance in NEI 01-01, Section 4.3.3, first bullet at the end of the first paragraph, this type of impact is NOT ADVERSE. Namely, although multiples <i>failures</i> will be created, only one (design) <i>function</i> (i.e., provide feedwater) is affected.</p> <p>The text will be modified to clarify this point.</p>
25b	Example 4-4	A25	C	(2) "Independence" (in its licensing application) is not applicable to non-safety-related SSCs. In this case, two main feedwater trains are provided for operational

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				<p>convenience and design considerations (e.g., pump sizing).</p> <p>The "what if" scenario presented in the comment regarding probability and its impact on reliability does need to be considered, but not as part of this digital specific aspect. Namely, impacts on reliability are addressed in the guidance contained in NEI 96-07, Rev. 1, Section 4.2.1.</p> <p>See note at the beginning of the Screen Response.</p>
25c	Example 4-4	A25	C	(3) See reponse to Item #25b.
26	Example 4-5	A26	C	<p>According to the currently endorsed guidance in NEI 01-01, Section 4.3.3, first bullet at the end of the first paragraph, this type of impact is NOT ADVERSE. Namely, although multiple <i>failures</i> will be created, only one (design) <i>function</i> (i.e., control temperature) is affected.</p> <p>The text will be modified to clarify that only one design function is affected.</p>
27	Example 4-6	A27	C	"Independence" (in its licensing application) is not applicable to non-safety-related SSCs. There is no design function to maintain physical separation of the multiple control systems that

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				<p>typically exists for most safety-related SSCs.</p> <p>This example (as with other examples) is intended to illustrate a digital specific aspect and is not meant to be inclusive of everything considered in the 10 CFR 50.59 review of an activity.</p>
28a	4.2.1.2	A28	C	<p>This comment, which gives the option to retain this section, is contrary to General Comment #4 (see Item #D), which recommends the removal of this section.</p> <p>This guidance does not address a generic guidance issue with NEI 96-07, Rev. 1. The purpose of this section is to provide digital-specific application of the related guidance from NEI 96-07, Rev. 1, Section 4.2.1.2.</p> <p>Furthermore, NEI 01-01, Section 4.3.4 contains guidance for HSI. Eliminating this section from Appendix D would result in the incomplete inclusion of pertinent guidance when NEI 01-01 is superseded.</p>
28b	4.2.1.2	A28	C	<p>The acronym HSI is already used in this section. The term "Human Factors Evaluation (HFE)" will be added in a manner similar to that used in Section 4.3 to</p>

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				describe a Qualitative Assessment.
NOTE: Disposition of Items #29 through #37 assume retention of Section 4.2.1.2.				
29a	4.2.1.2	A29	E	The intent of this guidance is to provide a process for the Screen practitioner to perform the HFE within the Screen if the practioner is sufficiently knowledgeable to do so. This approach is supported by by NEI 96-07, Rev. 1, Section 4.2.1, subsection titled "Screening for Adverse Effects" in the 5th paragraph, 1st sentence.
29b	4.2.1.2	A29	E	NEI 96-07, Rev. 1 contains guidance on how to "convert" a technical result into a licensing result (i.e., <i>adverse</i> or <i>not adverse</i> ) by "comparing" the new condition with the licensing condition ((refer to the diesel start time example embedded in NEI 96-07, Rev. 1, Section 4.2.1, subsection titled "Screening for Adverse Effects").
30a	4.2.1.2	A30	E	Detailed techncial guidance is provided in the references (e.g., NUREG-0700 and NUREG/CR-6947).
30b	4.2.1.2	A30	E	As with all 50.59 activities, the appropriate subject matter experts are expected to be consulted or participate in developing/creating the technical bases used in the 50.59 process, as necessary.

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31a	4.2.1.2	A31	C	The word "may" will be deleted.
31b	4.2.1.2	A31	C	<p>There is no inconsistency with NEI 96-07 and related conclusions in Examples 4-8a and 4-8b.</p> <p>However, use of the word "negative" in the HFE conclusion was inappropriate and will be removed, and the outcomes restated as statements of final conditions, not as "negative" or "positive." Then, as described in NEI 96-07, the Screen uses those final conditions to determine the type of impact (i.e., positive, negative, or none) on design functions (refer to the diesel start time example embedded in NEI 96-07, Rev. 1, Section 4.2.1, subsection titled "Screening for Adverse Effects").</p>
32	4.2.1.2	A32	E	Replace the word "final" with "next." However, the first two steps are clearly identified as being the "two-step HSI assessment," so there is NO "third" HSI assessment step.
33	4.2.1.2	A33	C	<p>The process and examples correctly implement NEI 96-07, Rev. 1 guidance.</p> <p>However, use of the word "negative" in the HFE conclusion was inappropriate and will be removed, and the outcomes restated as statements of</p>



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				final conditions, not as "negative" or "positive." Then, as described in NEI 96-07, the Screen uses those final conditions to determine the type of impact (i.e., positive, negative, or none) on design functions (refer to the diesel start time example embedded in NEI 96-07, Rev. 1, Section 4.2.1, subsection titled "Screening for Adverse Effects").
34	Example 4-8a	A34	C	<p>The HFE outcome is an increase in <i>response time</i>. However, there is no <i>response time</i> element within the identified design functions in this example. Therefore, although more time will be needed to perform the design function, there is no adverse impact on the ability to actually perform the described design function. The <u>not adverse</u> conclusion is correct in this example.</p> <p>If a <i>response time</i> element was included as part of the design function description, then the new <i>response time</i>, NOT the INCREASE in the <i>response time</i>, would be compared with the <i>response time</i> requirement in the licensing basis to determine the impact.)</p>
35	Example 4-8a	A35	C	The process and example correctly implement NEI 96-07, Rev. 1 guidance.

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				<p>However, use of the word "negative" in the HFE conclusion was inappropriate and will be removed, and the outcomes restated as statements of final conditions, not as "negative" or "positive." Then, as described in NEI 96-07, the Screen uses those final conditions to determine the type of impact (i.e., positive, negative, or none) on design functions (refer to the diesel start time example embedded in NEI 96-07, Rev. 1, Section 4.2.1, subsection titled "Screening for Adverse Effects").</p> <p>Propose to change subject sentence to, "The HFE evaluation determined that the modification increased in the operator's time to respond by requiring four actions instead of one action."</p>
36	Example 4-8b	A36 & A37	C	<p>The process and example correctly implement NEI 96-07, Rev. 1 guidance.</p> <p>However, use of the word "negative" in the HFE conclusion was inappropriate and will be removed, and the outcomes restated as statements of final conditions, not as "negative" or "positive." Then, as described in NEI 96-07, the Screen uses those final conditions to</p>

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				<p>determine the type of impact (i.e., positive, negative, or none) on design functions (refer to the diesel start time example embedded in NEI 96-07, Rev. 1, Section 4.2.1, subsection titled "Screening for Adverse Effects").</p> <p>Propose to change [A36] subject sentence to, "The HFE evaluation concluded that this modification could result in the operator choosing not to have certain parameters displayed, impacting their ability to monitor the plant and detect changes. In addition, altering the information displayed and the organization of the information will impact the operator's understanding of how the information relates to system performance. This impact on understanding will also impact the operator's ability to assess the situation and plan an appropriate response."</p> <p>Propose to change [A37] subject sentence to, "The HFE evaluation determined that the modification increased in the operator's time to respond by requiring four actions instead of one action."</p>
37	Example 4-8b	A38 & A39	C	[A38] This example (as with other examples) is intended

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				to illustrate a digital specific aspect and is not meant to be inclusive of everything considered in the 10 CFR 50.59 review of an activity.  [A39] Same as response to item 36.
<b>EVALUATION PHASE COMMENTS</b>				
38a	4.3	A40	C	"Expansion" and "paraphrasing" will be eliminated except for locations where required by digital-specific guidance.
38b	4.3	A40	C	NRC needs to identify the additional part(s) of the Supplement that need to be incorporated.  Supplement 1 to RIS 2002-22 is primarily a document for technical guidance (i.e., the preparation of qualitative assessments and the topics that should be considered therein), not licensing (i.e., 50.59) guidance. Only the guidance in Section 2.2 is related to 50.59, which has already been incorporated into Section 4.3 of Appendix D.
39a	4.3	A41	C	Guidance for how to perform a qualitative assessment (which is a <u>technical</u> assessment) is not pertinent in a licensing-based guidance document. NEI 16-16 (or equivalent) is the appropriate document for inclusion of technical guidance.

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39b	4.3	A41	C	<p>NRC needs to identify the specific additional part(s) of the Supplement that need to be incorporated.</p> <p>Supplement 1 to RIS 2002-22 is primarily a document for technical guidance (i.e., the preparation of qualitative assessments and the topics that should be considered therein), not licensing (i.e., 50.59) guidance. Only the guidance in Section 2.2 is related to 50.59, which has already been incorporated into Section 4.3 of Appendix D.</p>
39c	4.3	A41	C	Please clarify which restrictions on the applicability of the qualitative assessment so that we consider everything NRC is considering.
40	4.3	A42	C	The phrase "qualitative assessment" will be clarified to reflect its use in Supplement 1 of RIS 2002-22 and made consistent throughout the document.
41	4.3	A43	C	<p>NRC needs to identify the additional part(s) of the Supplement that need to be incorporated.</p> <p>Supplement 1 to RIS 2002-22 is primarily a document for technical guidance (i.e., the preparation of qualitative assessments and the topics that should be considered therein), not licensing (i.e., 50.59) guidance. Only the</p>

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				guidance in Section 2.2 is related to 50.59, which has already been incorporated into Appendix D, Sections 4.3.1, 4.3.2, 4.3.5 and 4.3.6.
42a	4.3.1	A44	C	The Industry agrees the word "initiator" does not exist in the 50.59 Regulation or in NEI 96-07, Rev. 1, Section 4.3.1. However, the NRC comment fails to identify that the word and consideration of "initiator" <b>does</b> exist in NEI 01-01, Section 4.4.1. Since NEI 01-01 is currently endorsed for use in completing 50.59 Evaluations for activities involving digital modifications, the inclusion of guidance in Appendix D, Section 4.3.1 regarding "initiators" is <b>NOT</b> "contrary to 50.59(c)(2)(i)."
42b	4.3.1	A44	C	<p>The Industry agrees with the second bullet point that a new initiator of an accident already evaluated in the UFSAR is considered in Evaluation question (i).</p> <p>Evaluation question (i) considers ONLY those accidents previously evaluated in the UFSAR. Contrast that with Evaluation question (v) which deals with the creation of the possibility of new accidents. The guidance for Evaluation question (v) in NEI 96-07, Rev. 1, Section 4.3.5</p>

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				contains the following statement: "A new initiator of an accident previously evaluated in the UFSAR is not a different type of accident."
43	4.3.1	A45	C	<p>The Industry agrees that an increase in accident frequency can be for a multitude of reasons, including increases from "new" and/or "entirely different" initiators. Refer to the detailed basis provided in the Industry Response to Item #42a &amp; #42b.</p> <p>Propose to edit the subject sentence, "After applying the generic guidance in NEI 96-07, Section 4.3.1 to identify any accidents affected by the systems/components involved with the digital modification and, <u>then</u> examining the initiators of those accidents, the impact on the frequency of the initiator (and, hence, the accident itself) due to the digital modification can be assessed."</p>
44	4.3.1	A46	E	See response to item #43.
45	Example 4-9	A47 & A48	C	The example will be revised to indicate that there are no accidents related to the chillers.
46	4.3.1	A49	E	Consistent use of "software CCF" (vs. failure, etc.) will be addressed.
47	4.3.1	A50 & A51	C	Clarification of concepts was dispositioned and closed in

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				April 2017 (see Public_Meeting_Items_and_Actions (NEI9607AppD_06212017). CCF outcomes of <b>sufficiently low</b> or <b>not sufficiently low</b> were finalized in RIS 2002-22 Supplement 1 and are the only "new" information incorporated.
48a	4.3.1 and Example 4-12	A52 & A53	C	The Industry agrees that meeting the requirements, etc. is <u>in addition to</u> all other considerations. This statement can be clarified to more clearly identify this fact.
48b	4.3.1 and Example 4-12	A52 & A53	C	See response to Item #47.
49	4.3.1 (and other similar locations)	A54	E	Subsection on Human-System Interface Assessment to be deleted.
50	4.3.1 (and other similar locations)	A55	E	Subsection on Human-System Interface Assessment to be deleted.
51	4.3.2	A56	E	<p>The Industry disagrees with the final phrase in the statement: "...reductions in redundancy, diversity and independence are general technical concerns for digital modifications and <b><u>not specifically tied to any single evaluation criteria under 10 CFR 50.59</u></b>" [<b><u>emphasis</u></b> added to the pertinent phrase].</p> <p>In Supplement 1 to RIS 2002-22, Section 3, 2nd paragraph, near the end of the first sentence (which</p>



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				<p>discussed the four terms) footnote No. 4 is included immediately following the last term.</p> <p>Footnote No. 4 clearly indicates that these terms refer to <b>ONLY</b> NEI 96-07, Section 4.3.2, which provides guidance for <b>ONLY</b> 10 CFR 50.59(c)(2)(ii).</p> <p>The discussion of these terms is located correctly and will not be relocated to the beginning of Section 4.3 as suggested.</p>
52	4.3.2	A57	C	Agree with the observation; general comment does not provide suggested changes.
53	4.3.2	A58	C	<p>The suggested NRC comment to add the phrase "of the design function" seems inappropriate because the suggested phrase is not in the reference.</p> <p>It is unclear how the second sentence is inconsistent with NEI 96-07, Rev. 1 or RIS 2002-22, Supplement 1.</p>
54	4.3.2	A59	C	Propose to remove discussions of these four terms.
55	4.3.2	A60	C	Propose to remove discussions of these four terms.
56	4.3.2	A61	C	Propose to remove discussions of these four terms.
57	4.3.2	A62	C	Agree to remove paragraph.

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58	4.3.2	A63	C	Propose to remove discussions of these four terms.
59	4.3.2	A64	C	Propose to remove discussions of these four terms.
60a	4.3.2	A65	C	(1) This comment is not related to 50.59 guidance. Furthermore, the NRC statement that " <i>Generally, only malfunctions are identified in the UFSAR, not the initiators of the malfunctions</i> " is not representative of most UFSARs. Namely, most UFSARs <u>do</u> identify most, sometimes all, malfunction (and accident) initiators.
60b	4.3.2	A65	C	<p>(2) The Industry agrees with the second point that a new initiator of a malfunction already evaluated in the UFSAR is considered in Evaluation question (ii).</p> <p>Evaluation question (ii) considers ONLY those malfunctions previously evaluated in the UFSAR.</p> <p>The Industry agrees that an increase in malfunction likelihood can be for a multitude of reasons, including increases from "new" and/or "entirely different" initiators.</p> <p>Propose to replace "If none of the components/systems involved with the digital modification are identified as</p>

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				affecting a malfunction initiator previously identified in the UFSAR, then there is no attributable impact on the likelihood of occurrence of a malfunction." with, "After applying the generic guidance in NEI 96-07, Section 4.3.2 to identify any malfunctions affected by the systems/components involved with the digital modification and, then examining the initiators of those malfunctions, the impact on the likelihood of the malfunction due to the digital modification can be assessed."
60c	4.3.2	A65	C	(3) Evaluation questions (ii) and (vi) address different aspects so thier "thresholds" cannot be compared.
61	4.3.2	A66 & A67	C	Clarification of concepts was dispositioned and closed in April 2017 (see Public_Meeting_Items_and_Actions (NEI9607AppD_06212017). CCF outcomes of <b>sufficiently low</b> or <b>not sufficiently low</b> were finalized in RIS 2002-22 Supplement 1 and are the only "new" information incorporated.
62	4.3.5	A68	C	The full text from Supplement 1 to RIS 2002-22, Section 2.2, subsection 10 CFR 50.59(c)(2)(v) will be included.

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				For completeness, the appropriate full text from Supplement 1 to RIS 2002-22, Section 2.2 will be added in 4.3.1, 4.3.2, and 4.3.6.
63	4.3.5	A69	C	"Failure likelihood" will be used throughout Appendix D in lieu of "software CCF" for consistency with RIS 2002-22, Supplement 1.
64	4.3.5	A70	E	Delete phrase.
65	4.3.5	A71	E	To be incorporated
66	4.3.5	A72	C	Note will be removed.
67	Example 4-16	A73	C	Example will be reworked to match the guidance.
68	Example 4-16	A74	C	Use of the phrase "qualitative assessment" will be clarified and made consistent.
69	Example 4-17	A75	C	Example will be reworked to match the guidance.
70	4.3.6	A76	C	Section 4.3.6 will be retained and is critical to the application of 10 CFR 50.59 to digital activities. NRC comments do not identify specific conflicts with 10 CFR 50.59 or associated regulatory basis and guidance documents.
NOTE: Disposition of Items #71 through #72 assume retention of Section 4.3.6.				
71	4.3.6	A77	C	In the "review" subsection, add the scope of "supporting UFSAR analyses..." from NEI 96-07, Rev. 1, Definition 3.12, Discussion section, first bullet, in the discussion of <i>safety analyses</i> .

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72	4.3.6	A78	C	Comment does not provide specific evidence of misplaced context or specific misinterpretation. While it would be ideal to refer to NEI 96-07, Rev.1, the importance of the quoted definitions and discussion highlights is critical to the proper application of 10 CFR 50.59 to digital activities. Specific conclusions of concern to the staff have not been identified.
73	4.3.6	A79	C	This concern is addressed in the preceding discussions and in Steps 2 and 5 of Section 4.3.6, in which all Design Functions are considered.
74	4.3.6	A80	C	Yes, 10 CFR 50.59(c)(2)(vi) states "Create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report (as updated)." The "results" in the UFSAR are presented in the safety analyses as defined in NEI 96-07, Rev. 1, Sec. 3.12. This is distinct from the broader descriptive material contained in the balance of the UFSAR, e.g. descriptions of a component's failure. NEI 96-07, Rev. 1, Sec. 4.3.6 begins with, "Malfunctions of SSCs are generally postulated as potential single failures to <b>evaluate</b>

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				<b>plant performance</b> with the focus being on the result of the malfunction rather than the cause or type of malfunction." <b>[emphasis added]</b> An SSC's functional level is generally too low to independently represent a malfunction result as discussed in NEI 96-07.
75	4.3.6	A81	C	See response to item #73.
76	4.3.6	A82	C	The referenced text relates to Section 4.3.2 in NEI 96-07, Rev. 1 and would not be considered as part of Section 4.3.6.
77	4.3.6	A83	C	The interdependent activities being discussed are not "compensatory actions." The actions being discussed are actions associated with the as-designed SSC. For example, a new digital system could be equipped with a "reset" button. If the operating procedure contains steps for manipulation of the reset button, then those instructions are NOT compensatory actions. However, if after utilizing the reset button, the SSC still does not function properly and OTHER actions NOT COVERED by any other procedure are developed in response to or to address the degraded condition of the SSC, then those newly-developed actions would be <i>compensatory actions</i> .

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				These types of activities (i.e., compensatory actions) are not unique to digital and would be addressed in accordance with the guidance in NEI 96-07, Rev. 1 (e.g., Section 4.3.2, Example 4, and Section 4.4).
78	4.3.6	A84	C	<p>Section 4.3.6.2 does not exist in NEI 96-07, Rev. 1. The quote is from NEI 96-07, Rev. 1, Section 4.3.2, which is not pertinent in Section 4.3.6 (of NEI 96-07 or Appendix D).</p> <p>Clarification/explanation of the comment/concern is needed.</p>
79a	4.3.6	A85	C	<p>[First Paragraph] The Industry agrees that "...there will never be any 'pre-existing safety analysis' for new types of events created by a change." That specific condition is not the subject of Evaluation question (vi), but would be addressed using Evaluation question (v).</p> <p>The guidance in Section 4.3.6 is correct for the cases in which a pre-existing safety analysis does exist. The statement regarding "no safety analysis involved" is to remind the 50.59 practitioner of the limitations of this particular question.</p>

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79b	4.3.6	A85	C	[Second Paragraph] The Industry agrees with statements made in this paragraph, but no suggested changes are identified.
79c	4.3.6	A85	C	[Third Paragraph] The Industry agrees with statements made in this paragraph, but no suggested changes are identified.
79d	4.3.6	A85	C	[Fourth Paragraph] Consequences (i.e., radiological dose) are addressed in two separate Evaluation questions: (iii) and (iv). ALL 50.59 questions must be addressed for any proposed activity (with the exception of activities involving Methods of Evaluation). If there is an impact on the radiological dose result, either question (iii) or (iv) will be the appropriate location, <b>not</b> question (vi).
80	4.3.6	A86	C	The statement will be changed from "meeting the acceptance criteria" to "being bounded."
81	4.3.6	A87	C	See Industry Responses in Items #79a and #79d.
82	4.3.6	A88	C	See Industry Response in Item #77.  There are no partial quotations.
83	4.3.6	A89	C	The effect of the increased feedwater flow was incorporated into the



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				example, as illustrated in the second paragraph for the response to Step #6. Consistent with the Six Step Process, a Design Function that is not associated with a Design Basis Function is identified as part of Step #2. That Design Function is then addressed as part of Step #s 5 and 6.
84	4.3.6	A90	C	The Industry agrees with the technical content of the comment. However, ONLY the impact on malfunction results is addressed in Evaluation question (vi), for which the stated conclusion is correct. The other valid concerns identified in the comment would be addressed in other pertinent Evaluation questions, such as (i), (ii) and (v).
85	4.3.6	A91	C	The statement will be changed from "meeting the acceptance criteria" to "being bounded."