CHAIRMAN Resource

From: Tom Gurdziel <tgurdziel@twcny.rr.com>
Sent: Sunday, November 04, 2018 6:14 PM
To: Transformation Resource
Cc: CHAIRMAN Resource; Screnci, Diane; 'Ed Stronski'; Bridget Frymire
Subject: [External_Sender] Comments on Accepting Digital Instrumentation and Controls

Good morning,

I have this idea after reading pages 12, 13, and 14 of Enclosure 5, "Additional Detail on Areas of Transformation Concurrence" dated 5/23/2018 of SECY-18-0060.

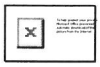
When we were building Nine Mile Point, Unit 2, I believe that we would inspect, say, an organization providing us with steel plates and structural shapes, then, after that organization was approved/accepted, these pieces would be considered to meet our requirements. Some inspection probably was needed there once in a while, and we probably had some receipt inspection requirements on the site.

Why can't we consider a code-issuing organization as able to provide, (without further challenge), software code and digital equipment requirements after we, (actually, the US NRC), determine that they are a credible organization? Then we would not need to write requirements on, effectively, how they do their work. It would follow that they could update code sections and code requirements without the US NRC having to issue rule changes or adjust other now-existing documents/guides.

This means that we are not doing any advanced notices for proposed rulemaking, (ANPR), and we are not doing any new rules, and we are not doing any regulatory guides, either. This would definitely be a transformation and might save large amounts of time and large amounts of money, not to mention the existing US commercial nuclear industry.

Thank you,

Tom Gurdziel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