CHAIRMAN Resource

From:	Tom Gurdziel <tgurdziel@twcny.rr.com></tgurdziel@twcny.rr.com>
Sent:	Saturday, May 18, 2019 11:18 PM
To:	CHAIRMAN Resource
Cc:	Transformation.Resource@nrc.gov; Bridget Frymire; Tim Echols; Screnci, Diane
Subject:	[External_Sender] A Few Thoughts on the 5/14/2019 Commission Meeting on Digital
Attachments:	Instrumentation and Control 1.JPG; 2.JPG; 3.JPG

Good morning,

I just finished listening to the second panel and, let me tell you, I am very disappointed. Let me just start off this way. The primary source of useful guidance, (which I have not read), appears to be, not an NRC-generated document but, rather, work from an industry group. It is NEI 96-07. Look at that number. The "96" tells you it has been around for about 23 years (since 1996). Actually, it is even worse than that. Commissioners at the meeting were using 30 years as the length of time this "effort" has been on-going. What has EACH EDO accomplished during his time of leadership service related to digital I & C during those 30 years? How much has been spent (over those 30 years) to get to where we are today?

Have you noticed that, over in Japan, they were able to destroy three reactor cores and, to date, do nothing about it? But, here in America, we act as if one common cause failure is even worse than that and completely unacceptable. Guess what, I have a common cause failure in my 2014 Chevrolet Impala right now and I continue to run it. (It won't be with me for much longer, though.) That failure has disabled three safety related systems. In fact, I have included the "alarm/notification" for each. Yet I did notice that NOBODY at the meeting questioned the assumed severity of a "CCF".

Has any NRC staff member or manager found out what Korea or China or France have for CCF and how they handle it, considering that, during the first panel, these countries were identified as using some digital I & C. Why not give them a telephone call and get a faster response than at the end of FY2020?

At 1:10:48 I would have to disagree. I don't see a new mindset for the staff or its management. They are still attempting to handle digital I & C the same way they have handled analog controls for the lightwater plants. The US nuclear world has changed but not at NRC Headquarters.

At 1:34:45 the definition of success for the NRC is incorrect. The picture of somebody using digital touch (I guess) screens to run a plant show (or would show) success for the commercial nuclear industry. However, success for the US NRC would be providing a realistic regulatory situation that could be <u>routinely used</u> by those regulated to include digital controls in their plants.

At 1:58:37 I note that a problem appears to be associated with different viewpoints on NEI 96-07, Appendix D and plant FSARs. Why not try this from the construction industry? I believe they do write contracts specifying Binding Arbitration in the case of otherwise unsolvable disputes. Put each side in a room with an arbitrator or mediator and force a settlement. Maybe then we can get moving on digital I & C.

Thank you,

Tom Gurdziel





