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# PUBLIC SUBMISSION

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**Docket:** NRC-2019-0086

Draft Regulatory Guide, DG- 1356, Guidance for Implementation of 10 CFR 50.59, “Changes, Tests, and Experiments”

**Comment On:** NRC-2019-0086-0001

Guidance for Changes, Tests, and Experiments

**Document:** NRC-2019-0086-DRAFT-0002

Comment on FR Doc # 2019-11246

## Submitter Information

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## General Comment

You should not issue your Appendix D until the investigation of the Boeing 737 crash is finished. Is the RG187 for digital the same as the FAA digital guidance for airplanes? The NY Times article on June 1, 2019 states that regulators were left in the dark about a fundamental overhaul to an automated system that would ultimately play a role in two crashes. The regulators did not perform a safety assessment of a newer update of the computer controls in the planes. The RG187 allows computer controls of old nuclear reactors without a regulator review at all. It would even allow failure of automated systems, and trust the power plant to calculate that accidents will not have bad consequences. The NRC should review and include the findings of the Government investigation of the FAA in RG1187. If nuclear automation could fail and cause accidents, it must be given to NRC for approval. Do not repeat what FAA failed to do.

The RG1187 needs to have plans for inspecting nuclear digital automation with RG1187. Please explain.

You need to do an environment impact assessment of digital changes that can allow errors in high radiation detectors needed for a LOCA. Your Appendix D says that radiation monitors can be installed without a low chance of failure. A different result does not happen because there is nothing in the safety analysis. Why would NRC allow struggling nuclear power plants to install this type of equipment and not even want to review it? Please explain. Radiation monitors are used by the State of Illinois to decide evacuation plans during a meltdown accident. The State should be notified of these changes of radiation monitors that are considered and be able to provide comments on environmental assessments and evacuaation.

The NRC needs to notify the State that the nuclear power plant can calculate different results without NRC review because of the safety analysis. Did the NRC agree to the wording of the original safety analysis

knowing computers would later be used? Did the State know this?

Please explain if automation with common failures be allowed if the toxic fuel can get closer to melting without NRC? Is there hearing rights if there is a chance of a new common failure with worst conditions inside the reactor than agreed to before with original equipment?

The NRC says that a common failure can be low enough with a quality assessment. Please explain the evidence and data you used for knowing when the chance of common failure is low enough.

The RG1187 says you reviewed international guidance for harmonization and found nothing useful. Please list all the guidance that was reviewed. We did a google search and found IAEA guidance. Does IAEA and other countries agree that common failure can be shown to be low enough with a quality assessment? Please explain.