



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

FEB 16 1977

MEMORANDUM FOR: Guy A. Arlotto, Director, Office of Standards
 Development

FROM: Robert L. Tedesco, Assistant Director for Plant
 Systems, DSS

SUBJECT: COMMENTS AND BALLOT - P-466, CRITERIA FOR THE
 DESIGN OF SAFETY-RELATED SURVEILLANCE INSTRUMENTATION (SRSI) IN NUCLEAR POWER GENERATING STATIONS

Enclosed are a Negative ballot and comments on P-466, Draft 3, Criteria for the Design of SRSI in Nuclear Power Generating Stations. The major focus of the standard is the identification of the functional requirements which are not required for SRSI. Thus, the appearance is that this standard is an indistinct attempt to establish diluted criteria for SRSI and is directed solely towards the licensing process. Little consideration is given to improving the nuclear power plant safety and/or operability. Therefore, it is our opinion that the development of this standard is premature.

This need for specific criteria for the design of SRSI and other similar instrumentation systems, which have an important role in determining that nuclear plants are operated safely and reliably (but which are not part of the plant safety systems), has been recognized for some time. However, it is important that any standards developed for these systems provide positive, consistent and systematic criteria and guidelines. To achieve this end, it is necessary that a base document defining the design base and identifying the criteria for these "Class 2E" systems be developed before attempting to develop the requirements for specific applications of these systems. Thus, we suggest that the development of the P-466 standard be tabled and that efforts first be centered on developing a base standard classifying SRSI and similar systems.

We are available to discuss any questions you have in regard to these comments.

Robert L. Tedesco, Assistant Director
 for Plant Systems
 Division of Systems Safety

Contact:
 R. Naventi
 X27233

cc: See Page 2

THIS DOCUMENT CONTAINS
 POOR QUALITY PAGES