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ARGONNE NATIONAL LABORATORY

9700 South Cass Avenue, Argonne, Illinois 60439

Tel (708) 252-4639 FAX: (708) 252-4978 PDR 9/25/92

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May 8, 1992

Mr. H. Alderman, Staff Engineer Advisory Committee on Reactor Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Alderman:

Subject: ACRS Joint Subcommittee Meeting on GE Advanced Boiling Water Reactor Control Room Design, May 4, 1992

General Electric concluded their presentation with the statement that "Reliable Software Needs No Additional Analog Backup." I do not agree with this conclusion.

General Electric has offered a commitment to deliver reliable software with negligible common mode failure probability. GE does not have an experience base to demonstrate that this commitment has been met in prior designs. Therefore, it would be prudent to include a carefully selected minimum set of hardwired instrumentation and controls in the main control room during a transition phase as nuclear power plant designs progress from completely hardwired to completely computerized designs. After an appropriate experience base is developed and lessons are learned, future designs may progress to completely computerized systems.

Sinchrely,

Walter P. Lipinski

Walter C. Lipinski, Ph.D. Reactor Enginteering Division

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