

# PUBLIC SUBMISSION

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Setpoints for Safety-Related Instrumentation

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Setpoints for Safety-Related Instrumentation

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Comment on FR Doc # 2020-17763

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## General Comment

NuScale Power LLC Letter dated September 30, 2014 provided 26 comments on DG-1141. Although most comments seem applicable to DG-1141 Comments # 1, 19, 23 and 25 seems to be applicable to the current scope of DG-1363. The points raised by NuScale regarding a) the expansive treatment of small instrument errors with little safety significance; b) use of two-sided statistical approach effectively establishing a 97.5% probability which may increase plant trip/transient probability; c) NRC expectations regarding bounding values for environmental testing required for digital I&C equipment per RG 1.209; and d) consistency with Standard Review Plan (NUREG-0800) Branch Technical Position (BTP) 7-12. The draft regulatory guide should address these technical issues previously raised by NuScale on DG-1141.