

DG-1363: Draft Regulatory Guide 1.105r4
Nonconcurrency Documents Released to the Public

The nonconcurrency package (NCP) on DG-1363 (NCP-2020-004, ADAMS Accession Number ML20181a524) identifies the ADAMS package described below as containing the documents cited in the NCP. Those documents, for the most part, have not been available to the public. NRC management has determined that release of those documents to the public is appropriate, subject to the criteria and considerations described below.

This paper describes the steps taken to permit the public release of the subject documents.

Caveats and Disclaimers:

1. The subject documents do not constitute, reflect, or describe any position or opinion on the part of the Nuclear Regulatory Commission. They are unofficial in-progress documents concerning the efforts and opinions of the author, who is also the author of the nonconcurrency, as of the time they were prepared (circa 2015).
2. The subject documents are of historical interest only, and do not have any regulatory significance.
3. Development and review of DG-1141 and of the documents derived from or related to it was terminated by the NRC in consideration of the issuance of a later revision to the associated industry standard. In consideration of that later revision of the industry standard, the NRC developed draft regulatory guide DG-1363. All NRC efforts related to DG-1141 and to the documents derived from or related to it have been terminated in favor of the efforts related to DG-1363.
4. The documents released to the public in accordance with this paper are substantially identical to the documents as they existed at the time of the nonconcurrency. Minor changes have been necessary in some cases, but none of the changes affects the meaning of any of the documents. Possible changes include the following:
 - a. In order to avoid the possibility of confusion with NRC positions or policies, an explanatory cover sheet has been added to each document and the documents have been prominently marked as "DRAFT" on each page.
 - b. Some of the subject documents include embedded notes or comments that were intended for use by the author or for consideration by NRC personnel in later reviews. In some cases, removal of some notes or comments has been appropriate because they could be cryptic or misleading without additional context. None of the notes or comments is germane to the nonconcurrency.

ADAMS Package: ML20006f031: "DG-1363: PJR Nonconcurrency"

(These are the Nonconcurrency Support Documents as of the time of the nonconcurrency)

Accession Number	Document Date ^a	Title	OAR ^b ?	Public?	Format ^c
ML081630179	30-Jun-2014	Draft Regulatory Guide DG-1141 (proposed revision 4 to RG 1.105) <i>as issued for public comment</i>	yes	yes	.pdf
ML20055G823	7-Aug-2020	Draft Regulatory Guide DG-1363 (second proposed revision 4 to RG1.105) <i>as issued for public comment</i>	yes	yes	.pdf
ML15335A085	(blank)	Response to Public Comments on DG-1141	no	no	.docx
ML19317D837	8-Dec-2015	Response to Public Comments on DG-1141 <i>with notes</i>	no	no	.pdf
ML15135A255	(blank)	Proposed Rev 4 to RG 1.105, based on DG-1141	no	no	.docx
ML19317D838	11-Sep-2015	Proposed Rev 4 to RG 1.105, based on DG-1141 <i>with commitment tracking¹</i>	no	no	.pdf
ML19239A261	6-Oct-2016	9595andSSS.pdf	no	no	.pdf

^a Document date in ADAMS at the time of the nonconformance

^b OAR: Official Agency Record

^c Format at the time of the nonconcurrency — all of these documents will be released in .pdf format

The documents in this package (ML20006f031) have been modified as described below, converted to official agency records, and released for access by the public. The listing presented below describes the specific actions taken to support the release of each document.

General Considerations

1. The ADAMS Accession Numbers of the subject documents remain unchanged.
2. The released documents are contained within the ADAMS package cited in the nonconcurrency and described above (ML20006f031). This paper and the nonconcurrency itself have been added to the package in the interest of completeness and transparency.

Document Information and Recommendations

The following listing presents descriptive information, rather than the formal title, of each document.

1. ML081630179: DG-1141

OAR: yes **Public:** yes **Format:** .pdf **ADAMS Date:** 6/30/2014

- a. The document has already been released to the public.

2. ML20055g823: DG-1363

OAR: yes **Public:** yes **Format:** .pdf **ADAMS Date:** 8/7/2020

(NOTE: The nonconcurrency cites DG-1363 as ML20009d873, dated February 2020: ML20009d873 is an ADAMS package that contains ML20055g823. The package also includes the nonconcurrency itself. The other documents in the package are not germane to the nonconcurrency)

(NOTE2: DG-1363 has been modified and issued subsequent to the nonconcurrency. The version available now differs from the version at the time of the nonconcurrency, but the changes do not affect the substance of or the reasoning behind the nonconcurrency.)

- a. The document has already been released to the public.

¹ Commitment Tracking: annotations tying specific statements in the draft guidance to commitments in the response document, to help ensure that those statements are not accidentally altered in subsequent editing.

3. ML15335a085: Draft Responses to Public Comments on DG-1141 — unannotated

Original Version: OAR: no Public: no Format: .docx ADAMS Date: blank
Released version: OAR: yes Public: yes Format: .pdf ADAMS Date: 7/20/2021
This version is the same as ML19317d837, but with annotations hidden.

- a. This document has been modified to add an explanatory coversheet, to add a “DRAFT” watermark to each page, and to convert the document to .pdf format.
- b. The only difference between the unannotated and annotated versions of the draft responses is that one has annotations suppressed and the other has them expressed.

4. ML19317d837 Draft Responses to Public Comments on DG-1141 — annotated

Original Version: OAR: no Public: no Format: .pdf ADAMS Date: 12/8/2015
Released version: OAR: yes Public: yes Format: .pdf ADAMS Date: 8/10/2021
This version is the same as ML15335a085, but with annotations revealed.

- a. This document has been modified to add an explanatory coversheet and to add a “DRAFT” watermark to each page.
- b. The only difference between the unannotated and annotated versions of the draft responses is that one has annotations suppressed and the other has them expressed.

5. ML15135a255: Draft RG 1.105 Rev 4 based on DG-1141 — unannotated

Original Version: OAR: no Public: no Format: .docx ADAMS Date: blank
Released version: OAR: yes Public: yes Format: .pdf ADAMS Date: 7/20/2021
This version was included in the NRC internal concurrence package of March 9, 2016. It was derived from ML19317d838, the version released for concurrence by the principal author of DG-1141, which includes commitment tracking¹ and notes. Those annotations are removed in this version, and other editorial and formatting changes may have been applied. This version is dated February 2016 on the first page, but the document date field in ADAMS is blank.

- a. This document has been modified to add an explanatory coversheet, to add a “DRAFT” watermark to each page, and to convert the document to .pdf format.
- b. With the exception of the minor changes described in the foregoing paragraph, this is identical to the version cited in the nonconcurrency.

6. ML19317d838: Draft RG 1.105 Rev 4 based on DG-1141 — annotated

Original Version: OAR: no Public: no Format: .pdf ADAMS Date: 9/11/2015
Released version: OAR: yes Public: yes Format: .pdf ADAMS Date: 8/10/2021
This is the document as released for internal NRC concurrence by the principal author of DG-1141. This version includes commitment tracking¹, notes, and indication of changes from DG-1141. It is possible that there are additional but unmarked editorial changes from DG-1141.

- a. This document has been modified to add an explanatory coversheet, to add a “DRAFT” watermark to each page, and to convert the document to .pdf format.
- b. With the exception of the minor changes described in the foregoing paragraph, this is identical to the version cited in the nonconcurrency.

7. ML19239a261: Increase in the probability of the loss of a safety function in all channels for a 5% vs 2½% probability of exceeding the Analytical Limit and/or failure to meet 95/95

Original Version: OAR: no Public: no Format: .pdf ADAMS Date: 10/6/2016
Released version: OAR: yes Public: yes Format: .pdf ADAMS Date: 10/6/2016

- a. This document presents an informal and unchecked analysis intended to compare the consequences of accepting a 5% vs 2½% probability of exceeding the setpoint analytical limit. It also explores the impact of failure to meet the 95/95 criteria in the establishment of the standard deviations of the various elements of error in an instrument loop.
- b. This document is used in support of statements in the NCP, but has no other regulatory significance.