

**From:** [Carolyn Lauron](#)  
**To:** [Justin Hawkins](#)  
**Cc:** [Demetrius Murray](#); [Greg Cranston](#); [Michael Dudek](#)  
**Subject:** NRC Staff Response to Clarification Question regarding Codes and Standards  
**Date:** Monday, October 24, 2022 2:15:00 PM

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Hi Justin –

Below is the staff's response to the question regarding codes and standards.  
Please let us know if you need additional information.

Thank you,  
Carolyn Lauron  
USNRC

**General Question:**

SMR (Holtec) posed the following question to the NRC staff:

The BIG PICTURE question is: do we use the most recent revision, or do we use the revision that is endorsed by the NRC?

For context, this question seems to apply in a lot of areas where the NRC originally endorsed an IEEE, ANSI, or some other standard, but the revision of that standard has been revised since the endorsement.

Examples: (these are examples and not the only recent standards under consideration)

1. The 1991 revision of IEEE 603 is endorsed by 10CFR50.55a. But it would make sense to us to use the 2018 revision.
2. The 2003 revision of IEEE 7-4.3.2 is endorsed by RG 1.152. But it would make sense to us to use the 2016 revision.

**NRC Staff Response:**

The NRC regulations and guidance endorse certain revisions of codes and standards and may include caveats or conditions. Following the NRC guidance is one acceptable way of meeting the regulations. An applicant may choose to use more recent revisions of a code or standard with justification on its applicability in meeting the regulations.

With respect to the two examples provided in the question:

- The NRC staff is receptive to the use of IEEE-603-2018. The NRC staff is considering regulatory options for endorsing this standard (ML21253A212). At this time, the license application would need to address the 1991 version currently incorporated by reference into 10 CFR 50.55(a). However, the NRC staff understands that the 2018 standard is more relevant and can be used to demonstrate compliance with the 1991 standard, given the similarity between the two versions. The NRC staff is available for a future pre-application discussion with SMR (Holtec) to discuss how this might be characterized or addressed in a future construction permit application.
- The NRC staff is receptive to the use of IEEE 7-4.3.2-2016. The NRC staff plans to issue a draft revision to RG 1.152 for comment in the near term, that would endorse

the use of this standard with exception to the Annexes (ML19113A269). The NRC staff notes that the 2016 standard also has the advantage of including criteria for addressing ISG-04 criteria for interdivisional communications (ML083310185).