



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 22, 2023

LICENSEE: n/a

FACILITY: n/a

SUBJECT: SRM-SECY-22-0076 - SUMMARY OF JULY 11, 2023, INFORMATION PUBLIC MEETING ON PROPOSED PLANS TO DEVELOP IMPLEMENTATION GUIDANCE CONCERNING POTENTIAL COMMON CAUSE FAILURES IN DIGITAL INSTRUMENTATION AND CONTROLS SYSTEMS (EPID L-2023-NFG-0004)

On July 11, 2023, an information meeting with a question-and-answer session was held between the U.S. Nuclear Regulatory Commission (NRC) and external stakeholders at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss the NRC staff's initial plan for developing the implementation guidance mentioned in SRM-SECY-22-0076, "Expansion of Current Policy on Potential Common-Cause Failures in Digital Instrumentation and Control Systems." The meeting notice and agenda, dated June 30, 2023, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML23181A068. A list of attendees is provided as Enclosure 1.

The NRC staff provided an overview and a point-by-point discussion on the content of SRM-SECY-22-0076. The Commission direction included developing or updating implementing guidance to be consistent with the revised policy discussed in the staff requirement memorandum (SRM), ensuring the policy is applicable to all licensing pathways, and issuing the implementing guidance within 12 months of the date of the SRM. To meet the Commission's direction to issue final implementing guidance, the NRC staff mentioned that we are considering updating Branch Technical Position (BTP) 7-19 in the Standard Review Plan for light water reactors and considering updating design review guidance for nonlight water reactors. The NRC staff noted that BTP 7-19 contains criteria for (1) precluding common cause failure and (2) acceptance for analyses. In addition, the NRC staff talked about other options, such as updating or creating a new regulatory guide or possible endorsement of guidance developed by industry. The NRC staff mentioned that the only options that would be considered viable are options that can be completed within 12 months. At the time of the meeting, no decision had been made which guidance documents, if any, would be updated.

Members of the public were in attendance. During the question-and-answer portion of the meeting, the following comments were provided to the NRC staff:

- Guidance should be useful “out of the gate.”
- Urge caution with use of the term “safety functions” because it does not appear to have a regulatory definition.
- Provide more detail with regards to the statement in Point 4 that applicant may propose a different approach.

In addition to the comments, the public had the following questions:

- What circumstances put possible endorsement of NEI 20-07 outside of the 12-month timeframe?
- Does the NRC plan to update Regulatory Guide 1.233?
- What is meant by independence of licensing pathways?
- What are the performance objectives for critical safety functions?
- Would the NRC staff be open to realistic time response to accidents and consideration of manual actions?
- Would the NRC staff be open to other changes to BTP 7-19?
- What does the NRC staff mean by keeping the instrumentation and control guidance separate from probabilistic risk assessment guidance?
- Proposed guidance seems to be high level; do we know what the Commission meant by “final” implementation guidance?

Public Meeting Feedback forms were not received. No regulatory decisions were made during the meeting. Please direct any inquiries to me at 301-415-2871, or [michael.marshall@nrc.gov](mailto:michael.marshall@nrc.gov).

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Plant Licensing Branch 1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
List of Attendees

LIST OF ATTENDEES

JULY 11, 2023, INFORMATION PUBLIC MEETING WITH EXTERNAL STAKEHOLDERS  
ON PROPOSED PLANS TO DEVELOP IMPLEMENTATION GUIDANCE CONCERNING  
POTENTIAL COMMON CAUSE FAILURES IN DIGITAL INSTRUMENTATION AND  
CONTROLS SYSTEMS

<b>Name</b>	<b>Organization</b>
Samir Darbali	U.S. Nuclear Regulatory Commission (NRC)
Michael Marshall	NRC
Jim Shea	NRC
Jana Bergman	Curtiss Wright
Christina Antonescu	NRC
Steven Alferink	NRC
Joseph Ashcraft	NRC
Bill Hannaman	-----
Sergiu Basturescu	NRC
Robert Chenkovich	Dominion Energy
Ted Quinn	-----
Steve Wyman	NRC
Raymond Herb	Southern Nuclear Company
Brian McMahon	Framatome
Alan Campbell	Nuclear Energy Institute
Arthur Holtz	Jensen Hughes
Jason Paige	NRC
Thomas Basso	Nuclear Energy Institute
Brian Mount	Dominion Energy
Alan Smith	-----
Wes Brinsfield	Jensen Hughes
Marcia Carpentier	NRC
Erin Wisler	-----
Collin Parry	-----
Mike Dunevant	TerraPower
Neil Archambo	-----
Raymond Schneider	Westinghouse
Sunil Weerakkody	NRC
De Wu	NRC
Francis Mascitelli	Constellation Nuclear
Mohammad Alavi	-----
Charley Peabody	NRC
Jerry Mauck	-----
Ming Li	NRC
David Rahn	NRC
Richard Rolland	Westinghouse
Doug Eskins	NRC

Name	Organization
Ho Thu	Dominion Energy
Warren Odess-Gillett	-----
Suzanne Loyd	Constellation Nuclear
Caroline Larsen	NRC
Wesley Steh	-----
Dinesh Taneja	NRC
Sushil Birla	NRC
Calvin Cheung	NRC
Jack Zhao	NRC
Christopher Cook	NRC
Stew Yuen	Nuclear Energy Institute
Dolan, Bradley Wicker	Tennessee Valley Authority
Richard Supler	ENERCON
Ron Jarrett	Paragon
Golub, Pareez	Sargent & Lundy
Richard Stattel	NRC
Derek Halverson	NRC
Anya Kim	NRC
Gilberto Blas Rodriguez	NRC
Robert Williams	NRC
Sheldon Clark	NRC
Han Bao	Idaho National Laboratory
John Lane	NRC
Johnston, Jeanne	Southern Nuclear Company
Andrea Kock	NRC
Wendell Morton	NRC
Baofu Lu	-----
Thomas Jaeger	Dominion Energy
Stephen Middlekauff	-----
Mary Miller	Dominion Energy
Phil Couture	-----
Brian Haynes	Framatome
Jacob Davis	NRC
Norbert Carte	NRC
Aaron Green	Framatome
Svetlana Lawrence	Idaho National Laboratory
William Catullo	Paragon
Mauricio Gutierrez	NRC
Step Wesley	-----
Ian Jung	NRC
Eric Benner	NRC
Khoi Nguyen	NRC
Nick Smith	NRC

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**ADAMS Accession Nos.:**

**Meeting Notice, ML23181A068**

**Meeting Summary, ML23233A068**

**Handouts, ML23191A065**

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DEX/ELTB/BC	NRR/DORL/LPL1/PM
NAME	MMarshall	KZeleznock	JPaige (LRamadan for)	MMarshall
DATE	08/21/2023	08/21/2023	08/22/2023	08/22/2023

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