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April 25, 2000

Samuel J. Collins
Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Nuclear Power Facility Instrument Setpoint Issues
NRC & ISA SP67.04 Sub-Committee Collaboration

Dear Mr. Collins,

For many years, the ISA standards sub-committee SP67.04 has been the leading forum within the nuclear industry for addressing instrument setpoint related issues. The committee has worked hard to help both the nuclear industry and the NRC fulfill the many needs for clear guidance related to instrument setpoints and uncertainties. The development and issuance of the nuclear standard SP67.04.1 "Setpoints For Nuclear Safety-Related Instrumentation" (endorsed through RG 1.105) and it's "Recommended Practices" document, SP67.04.2, are examples of how the committee responds to such needs. The committee is a true cross section of the nuclear community representing all interested parties, user, supplier and regulator and has the full support and backing of the nuclear power industry as evidenced by their continuous support. The committee is dedicated to supporting the nuclear power industry and the NRC in its endeavors to address the ever-evolving instrument setpoint and uncertainty issues.

However, the committee is concerned that the NRC appears to be decreasing its collaboration efforts with the committee and addressing instrument setpoint and uncertainty issues independently of 67.04 involvement. In addition, as experienced people have left the nuclear industry and new personnel assume the instrument setpoint related responsibilities, they are unaware of the efforts of SP67.04. As a result, many of the setpoint type issues are attempting to be addressed by the various specialty organizations such as NSSS owners groups, EPRI, NEI and INPO.

The ISA SP67.04 standards sub-committee would hope to continue to be the primary nuclear industry forum for addressing instrument setpoint and uncertainty issues. The committee is in

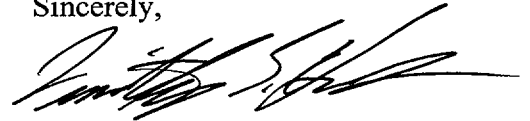
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the process of contacting the various owners groups and other organizations in an attempt to consolidate the setpoint issues and prevent a disjointed resolution by the nuclear industry. To be successful though, the committee needs the support of the NRC. To this end, I would like to request a meeting between myself and a select number of committee members and representatives of the various NRC Divisions and Branches that deal with the setpoint issues. The purpose of the meeting is to define how the two groups can better work together to identify and address ongoing issues related to instrument setpoints and uncertainties for the betterment of the nuclear power industry and the general public. This would include both staff and regional issues.

Please let me know when we may schedule a meeting so that proper arrangements can be made. I look forward to your response and if you have any questions, please do not hesitate to contact me at the indicated address, phone or e-mail.

Sincerely,



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