



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001

July 15, 2005

Mr. Luis Reyes
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Dear Mr. Reyes:

SUBJECT: PROPOSED REVISION 2 TO REGULATORY GUIDE 1.152, "CRITERIA FOR USE OF COMPUTERS IN SAFETY SYSTEMS OF NUCLEAR POWER PLANTS"

During the 524th meeting of the Advisory Committee on Reactor Safeguards on July 6-8, 2005, we reviewed the proposed Revision 2 to Regulatory Guide 1.152. During this review, we had the benefit of discussions with the NRC staff and of the documents referenced.

RECOMMENDATION

Revision 2 to Regulatory Guide 1.152 should be issued.

DISCUSSION

The current Regulatory Guide 1.152, Revision 1, endorses IEEE Std. 7-4.3.2-1993, "IEEE Standard Criteria for Digital Computers in Safety Systems of Nuclear Power Generating Stations." This standard has been updated as IEEE Std. 7-4.3.2-2003 to address advances in computer technology. The proposed Revision 2 to Regulatory Guide 1.152 endorses the updated IEEE standard (excluding its annexes) and provides guidance on cyber security, which is not addressed in the IEEE standard.

During the public comment period, the staff received 20 comment letters. We agree with the staff's resolution of these comments. Several commenters objected to the inclusion of guidance on cyber security in the regulatory guide and argued that the staff

should wait until the industry or technical societies develop relevant guidance. The staff responded that they believe such guidance is several years away. Due to the increasing use of digital systems at nuclear power plants, the staff has chosen to address cyber security without further delay. The staff is actively involved in industry activities in this area and plans to revise the regulatory guide when an industry standard becomes available. We agree with the staff's position on this matter.

Sincerely,

/RA/

Graham B. Wallis
Chairman

References:

1. Memorandum from Richard J. Barrett, Director, Division of Engineering Technology, Office of Nuclear Regulatory Research, to John T. Larkins, Executive Director, Advisory Committee on Reactor Safeguards, "Regulatory Guide 1.152, Revision 2, "Criteria for Use of Computers in Safety Systems of Nuclear Power Plants," May 31, 2005. (ADAMS #ML051290100)
2. IEEE Power Engineering Society, "IEEE Standard Criteria for Digital Computers in Safety Systems of Nuclear Power Generating Stations," IEEE Std. 7-4.3.2-2003, December 19, 2003.