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Rules and Directives

LRN-01-0406

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66FR 51479

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Secretary of the Commission
U. S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Gentlemen:

**COMMENTS ON DRAFT GUIDE, DG-1077,
"GUIDELINES FOR EQUIPMENT QUALIFICATION OF MICROPROCESSOR-BASED
EQUIPMENT IMPORTANT TO SAFETY IN NUCLEAR POWER PLANTS"
(Federal Register Vol. 66, No. 195, pp. 51479-51480, dated October 9, 2001)**

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for public input to the referenced Federal Register Notice.

The U.S. NRC is developing this draft guide to provide guidance to licensees and applicants on methods acceptable to the NRC staff for evaluating the environmental qualification procedures for microprocessor-based equipment that is important to safety for service in nuclear power plants.

PSEG Nuclear LLC appreciates the opportunity to comment on the DG-1077 and is pleased to submit attached comments. If you have questions regarding the comments, please contact Mr. Howard Berrick at 856-339-1862.

Sincerely,

G. Salamon

Manager - Nuclear Safety and Licensing

Attachment: Comments on DG-1077, "Guidelines For Equipment Qualification Of
Microprocessor-Based Equipment Important To Safety In Nuclear Power
Plants."

Template = ADM-013

E-RIDS = ADM-013
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NOV 06 2001

HGB

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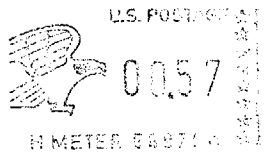
 Mr. K. Tosch, Manager IV
 Bureau of Nuclear Engineering
 P. O. Box 415
 Trenton, NJ 08625

ATTACHMENT**Comments on DG-1077, "Guidelines For Equipment Qualification Of Microprocessor-Based Equipment Important To Safety In Nuclear Power Plants"**

PSEG Nuclear understands the NRC's preference to endorse Regulatory Guides and approved industry standards in their guidance, however if this document is to become the standard for qualification for microprocessor based systems important to nuclear safety then the staff should recognize other acceptable (and NRC endorsed) industry guidance as well. Based on the this, PSEG Nuclear's comment is as follows:

Paragraph C2 (page 7) and Regulatory Analysis section 2.3 (page 16) should be revised to add reference to EPRI TR-102323 as an additional acceptable method for addressing the electromagnetic & radio frequency interference (EMI/RFI) issue. The staff issued an SER for this document endorsing it as an acceptable method and therefore readers should be informed that there is an additional acceptable method for addressing the EMI/RFI issue.

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