

May 30, 2003

Mr. William A. Horin
Nuclear Utility Group
on Equipment Qualification
Winston & Strawn
1400 L Street, N.W.
Washington, D.C. 20005-3502

SUBJECT: DRAFT REGULATORY GUIDE DG-1107, "GUIDELINES FOR
ENVIRONMENTAL QUALIFICATION OF MICROPROCESSOR-BASED
EQUIPMENT IMPORTANT TO SAFETY"

Dear Mr. Horin:

I am responding to your letter dated April 28, 2003, to Dr. William D. Travers, Executive Director for Operations, U. S. Nuclear Regulatory Commission (NRC). In your letter, you requested that the NRC not issue guidance for environmental qualification of microprocessor-based equipment until after the IEEE issues a 2003 revision to IEEE 323, *IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations*. You also reiterated concerns of the Nuclear Utility Group on Equipment Qualification (NUGEQ) regarding the regulatory positions discussed in DG-1107 as published for comment. Those concerns had been presented to the NRC staff in NUGEQ's comments on DG-1107 (ref. letter dated December 14, 2001) and briefly summarized in your oral presentation to the NRC's Advisory Committee on Reactor Safeguards (ACRS) on February 6, 2003.

As you know, the NRC staff has made substantive changes to the draft guide to address a large number of public comments on DG-1107. The comments and associated changes to the guide were presented to the ACRS in the February 6 meeting in which you participated. However, to ensure that the regulatory guidance for environmental qualification of microprocessor-based equipment will be consistent with the broader regulatory framework for equipment qualification for both mild environments and those environments covered by the requirements of 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants," the staff has elected to defer issuance of final guidance for environmental qualification of microprocessor-based equipment pending the outcome of the IEEE-323 ballot. After the IEEE has determined the resolution of negatives in the ballot process, presumably leading to publication of the 2003 edition, the staff will make a determination regarding its next steps regarding revised guidance for environmental qualification.

Finally, you expressed concern that we had not sufficiently engaged our stakeholders in the resolution of public comments on this guide. You particularly noted that several commentors found the guide "confusing and unnecessary" and that comment resolution "apparently required substantial revisions" to the published version of the draft guide. I appreciate you sharing your perspective on this important element of our process. We look forward to further interaction

W. Horin

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with you and other stakeholders as we develop and implement current, unambiguous and consistent regulatory guidance for environmental qualification.

Sincerely,

/RA/

Michael E. Mayfield, Director
Division of Engineering Technology
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