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**Subject:** Draft Regulatory Guide DG-1128

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Attached, please find Westinghouse Electric Company comments on Draft Regulatory Guide DG-1128, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants" in response to a Federal Register notice dated August 15, 2005 (ML0521503010).  
(See attached file: LTR-NRC-05-63 DG1128 comments.pdf)

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October 21, 2005

**Subject: Draft Regulatory Guide DG-1128**

Westinghouse Electric Company hereby submits the following comments on Draft Regulatory Guide DG-1128, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants" in response to a Federal Register notice dated August 15, 2005 (ML0521503010).

#### **Background**

IEEE Std 497-2002, Clause 1.3 describes the application of the standard. The last sentence in this section states the following:

"This standard also does not apply to instrumentation used to support contingency actions in emergency operating procedures or to instrumentation required to support plant shutdown from outside the control room."

Clause 4.1 provides guidance for the selection of Type A variables. The "contingency actions" exclusion also appears in the last paragraph of this section as follows:

"Type A variables provide information essential for the direct accomplishment of specific safety-related functions that require manual action. These variables are a subset of those necessary to implement the plant specific emergency procedure guidelines (EPGs) or the plant specific emergency operating procedures (EOPs) or the plant abnormal operating procedures (AOPs). Type A variables do not include those variables that are associated with contingency actions that may also be identified in written procedures."

Regulatory Position #4 in the draft regulatory guide deletes the final sentence of Clause 4.1, and replaces the last sentence of Clause 1.3 with the following:

"This standard also does not apply to instrumentation required to support plant shutdown from outside the control room."

The argument stated in the draft regulatory guide for making the change is "Revision 3, provided a prescriptive list of variables to monitor, whereas this revision provides a non-prescriptive, performance-based approach to variable selection. Thus, in this performance-based guide, the staff cannot endorse the

carte blanche exclusion of contingency actions from the selection criteria (especially those associated with plant-specific operating procedures or guidelines)."

#### **Statement of Concern**

The concern with the proposed revision to IEEE Std 497-2002 is that all references to contingency actions are deleted from the criteria. Whereas, the standard excluded the consideration of all contingency actions, the proposed revision to the Type A selection criteria in the draft regulatory guide does not provide any limitation to the contingency actions that must be considered except in the explanatory paragraph included in the regulatory guide.

#### **Proposed Alternative Solution**

Instead of simply deleting all references to contingency actions in IEEE Std 497-2002 as suggested in the draft regulatory guide, a portion of the explanatory paragraph included in the draft regulatory guide should be included. For example, the last paragraph of Clause 1.3 could be replaced with the following:

"This standard also applies to accident monitoring instrumentation necessary for the operator to execute contingency actions that are considered part of the plant specific emergency procedure guidelines (EPGs) or plant specific emergency operating procedures (EOPs).

This standard does not apply to accident monitoring instrumentation that is intended solely for historical recording or solely for maintenance purposes. This standard also does not apply to instrumentation required to support plant shutdown from outside the control room."

#### **Justification**

If all references to "contingency actions" are deleted from the standard, the user could infer that all contingency actions should be addressed when applying the performance-based guide. Whereas the draft regulatory guide did include an explanatory paragraph, the standard should also include an explanation of the scope of contingency actions that should be addressed. By restricting the contingency actions to those contingency procedures that are associated with the EPGs or plant EOPs, guidance is provided to the user of the standard as to the scope the contingency actions must be considered.

For example, with the absence of any guidance concerning contingency actions, the user could imply that contingency actions associated with severe accidents must be addressed when applying the standard. But based upon the explanatory paragraph in the draft regulatory guide, that certainly is not the intent of the proposed Position #4 changes. Another example could be the plant emergency response level procedures. Again, the intent is not to include these plant procedures since they are not considered part of the plant EOPs.

#### **Additional Editorial Comment**

Section C, Position #2 proposes to modify the first sentence in the second paragraph of Clause 6.7 in order to relax the requirement of IEEE Std 497-2002, as it relates to instrumentation calibration during an accident. The proposed modification is as follows:

"To the maximum extent possible, considering instrument accessibility, means shall be provided for maintaining instrument calibration during the accident."

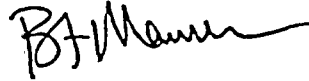
However, the sentence immediately following in the standard states the following:

"One or more of the following (actions) may accomplish this:"

Only one of the four actions listed actually requires access to the instrumentation; therefore, it is not clear that any requirements are, in fact, relaxed.



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