



NUCLEAR ENERGY INSTITUTE

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July 24, 2007

Mr. John A. Grobe  
Associate Director for Engineering and Safety Systems  
U.S. Nuclear Regulatory Commission  
Mail Stop O-5 E7  
Washington DC 20555

**Subject:** Comments on Digital I&C Project Plan

**Project Number: 689**

Dear Mr. Grobe:

This letter provides the Nuclear Energy Institute's (NEI's)<sup>1</sup> comments on the Digital Instrumentation and Control (I&C) Project Plan dated July 12, 2007. The following comments were developed with input from industry participants on NEI's Digital I&C and Human Factors Working Group:

1. Compared to earlier versions of the project plan, NRC has accelerated efforts to issue interim guidance. In some cases, this results in interim guidance being generated before the work necessary to support development of that guidance is completed. Industry is concerned that this approach may result in guidance that may not be practical to implement. It is essential that the NRC staff remain fully engaged in the efforts of the task working groups after the accelerated due date established by the Commission and that revisions to the applicable Interim Staff Guidance be published as necessary to ensure that the full potential of digital I&C upgrades is realized.

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<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Mr. John A. Grobe

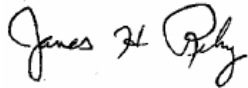
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2. Many important actions in this plan are characterized as long-term and do not yet have assigned due dates. A more detailed, resource loaded project plan would be beneficial for setting realistic expectations and establishing priorities. Management attention is needed to ensure that schedules are developed and the issues are resolved in a timely and effective manner.
3. The Task Working Group (TWG) #6, Licensing Process, effort is very important to industry; however, the project plan contains no near-term milestones and deliverables for that Task Working Group. NEI requests that NRC work with industry to further develop and execute a plan for improving the licensing process for digital I&C.
4. For TWG #5, Highly Integrated Control Room-Human Factors, industry recommends adding deliverables for receiving NRC comments on the Minimum Inventory and Computerized Procedures white papers, issuing industry guidance on those topics, and obtaining NRC endorsement of that industry guidance. The due dates for these deliverables should be discussed and agreed to by industry and the NRC.

If you have any questions regarding this letter, please contact me (202-739-8137; [jhr@nei.org](mailto:jhr@nei.org)) or Kimberly Keithline (202-739-8105; [kak@nei.org](mailto:kak@nei.org)).

Sincerely,



James H. Riley

c: Ms. Belkys Sosa, Director, Digital I&C Task Working Groups, NRC  
Mr. John M. Smith, Project Manager, NRC