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Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment on proposed GL 98-XX re "Yr 2000 Readiness of Computer Sys at NPPs."

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Jan. 29, 1998
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102-04086 – JML/SAB/RMW
March 3, 1998

Chief, Rules and Directives Branch
Division of Administrative Services
U. S. Nuclear Regulatory Commission
Mail Stop T6-D69
Washington, DC 20555-0001

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)**
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Proposed Generic Letter 98-XX: Year 2000 Readiness of Computer Systems at Nuclear Power Plants.

Enclosure 1 provides Arizona Public Service Company's (APS) comments on Proposed Generic Letter 98-XX: Year 2000 Readiness of Computer Systems at Nuclear Power Plants. Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions or would like additional information regarding this matter. This letter does not make, or imply, any commitments to the NRC.

Sincerely,

JML/SAB/RMW/rlh

cc: E. W. Merschoff
J. W. Clifford
J. H. Moorman
K. E. Perkins

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C&R-25 Data
x IO&R-5 G.L.

PR

ENCLOSURE 1

Comments on Proposed Generic Letter 98-XX: Year 2000 Readiness of Computer Systems at Nuclear Power Plants.

APS provides the following comments regarding proposed Generic Letter 98-XX: Year 2000 Readiness of Computer Systems at Nuclear Power Plants:

1. The references to year 2000 readiness and compliance used throughout the proposed generic letter should be changed, as appropriate, to use the terminology that is evolving into the industry standard. These terms are:

   - "Y2K Compliant", meaning that the application or equipment will function with 4 digit years properly through the 21st century, including leap years.

   - "Y2K Ready", which means the application or equipment will work correctly using modified logic and two-digit date fields as it makes the transition into the year 2000. Although the applications or equipment may be expected to transition smoothly into the year 2000, they may fail due to a date-related problem at some known time beyond this date. The expected failure date will be highly unit and plant specific, and may be acceptable based on the projected future use of the affected application or equipment, or the remaining life, including life extensions, of the unit or plant under question. The proposed generic letter must allow for the use of Y2K Ready systems and applications, since this method of resolving the Y2K problem is a highly viable and cost effective solution to this problem. The industry has recognized that most computer systems, applications and equipment used at each facility will function correctly, if modified to be Y2K Ready, for the remaining expected life of that computer system, application or equipment, or through the remaining life of the facility, without being fully Y2K Compliant.

   APS strongly believes the distinction between the above two definitions needs to be captured in the proposed Generic Letter to allow more viable, cost-effective solutions to Y2K issues.

2. The sixth paragraph of "Description of Circumstances" states that "NEI was preparing a framework document with guidance for utility use in readying for the Year 2000". This sentence should be modified to read: "NEI presented a framework document that provides guidance for utilities to use in readying for the Year 2000".

3. The sixth paragraph of "Description of Circumstances" also states "The document recommends methods for nuclear utilities to attain Y2K readiness and thereby ensure that their facilities remain safe and continue to operate within the requirements of their license". While the NEI/NUSMG document provides guidance to utilities for addressing the Y2K problem, it does NOT ensure or imply that plants will "remain safe and continue to operate within the requirements of their license". Therefore, this statement should be modified to eliminate the words "and thereby ensure that their facilities remain safe and continue to operate within the requirements of their license".

4. Paragraph one of "Discussion", specifically item four of this paragraph, could be interpreted to mean that all codes in use today that have a date function should be evaluated to determine if any past or current output from those codes have been affected by the Y2K problem, i.e., all past engineering calculations should be evaluated to verify that the calculation is not affected. Although APS does not believe that this is the intent of this paragraph, further discussion should be provided to define what actions may be required to address the concerns of this paragraph. An example that would require further evaluation would be where a code is found to have a Y2K problem that occurs prior to the year 2000, or is forward looking such that the present output of the code is affected, and the code is used to support the licensing basis of the plant. In this situation, a review of the code output would be warranted.

5. The sixth paragraph of "Discussion" should be modified to read as follows: "The staff believes that the guidance in NEI/NUSMG 97-07, when properly implemented, is an acceptable approach...". It should be noted that this guidance provides a framework only and must be modified to address the embedded systems, design features, policies and procedures, at a minimum, that are unique to each facility.

6. Required Response 1 implies that the guidance provided in NEI/NUSMG 97-07 has been endorsed by the NRC and that other Y2K programs would require further evaluation by the NRC. As described above, the NEI/NUSMG guidance provides a framework only and must be modified to more fully address embedded systems and design features, policies and procedures unique to each facility. It should be made clear in the Generic Letter that such an adaptation of the NEI/NUSMG guidance would meet NRC expectations.

7. Required Response 1 could be interpreted to mean that a description of a facility's complete Y2K Program should be provided to the NRC, including those applications and equipment that may not affect the operation of the facility, but are important to the operation of ancillary systems or services of the facility. Since correct operation of these ancillary systems and services have no impact

on the operation of safety-related systems or systems that have been determined to be essential for power operations of the facility, information regarding these systems should not be required to be provided to the NRC. Providing this information would greatly increase the burden placed on both the facility's and NRC staff, without providing any nuclear safety benefit. Therefore, Required Response 1 should be modified to provide clarification that the required response only applies to safety-related systems and systems that are essential for power operations of the facility.

8. Required Response 2 is confusing in that it is not clear as to what information should be provided by July 1, 1999. If a facility is not Y2K Ready by this date, then the facility will not be able to confirm that it is Y2K Ready on this date. An assumption must be made that the intent of this statement is to provide a status and completion schedule for those major work activities that must still be completed if a facility is not Y2K Ready by July 1, 1999 and confirm that this work will be completed prior to January 1, 2000. In addition, as described in Comment 8 above, information regarding applications and equipment used in ancillary systems and services should not be provided in the facility's response to this item. Therefore, Required Response 2 should be re-worded as follows: "No later than July 1, 1999, submit a written response confirming that your facility is Y2K Ready for safety-related systems and systems that are essential for power operations, at a minimum. If your program is incomplete as of that date, provide your schedule of major work activities that must be completed and confirm that your facility will attain the status of Y2K Ready with respect to these systems prior to January 1, 2000. The status of systems that are not safety-related and are not essential for power operations need not be reported."

   The words "...and in compliance with the terms and conditions of your license(s) and NRC regulations" do not add any benefit to this required response. Current NRC regulations provide sufficient assurance that a facility will be in compliance with the terms and conditions of the facility's license(s) and NRC regulations upon completion of the facility's Y2K Program.

   The definitions of Y2K Ready and Y2K Compliant should also be removed from this required response. These terms will be sufficiently defined in the body of the generic letter provided that Comment 2, above, is incorporated.