

PUBLIC SUBMISSION

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Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants

Comment On: NRC-2017-0237-0001

Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants; Request for Comment on Draft Regulatory Guide

Document: NRC-2017-0237-DRAFT-0004

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SUNSI Review Complete

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General Comment

Pg. 3: Please add reference to IEEE Std. 279 along with the IEEE Std. 603 in the last bullet, based on the LDB of the operating plants.

Pg. 5: Please correct "IEE" to "IEEE" in the last paragraph.

Pg. 8: Changing the Type A variables application scope by adding the contingency actions would contradict the current LDB

and Tech Spec requirements with respect to the PAM instrumentation at the operating plants. Per Clause 4.1, manual actions are taken

taken in response to Type A variables information are taken during design basis events considered in the FSAR, while

contingency actions are taken to mitigate plant conditions occurring as a result of multiple equipment failures.

Pg. 9, Current plants include allowances for measurement errors in the LSSS calculations consistent with their setpoint

methodology. Proposed EOP instrument range determination method should be further evaluated for consistency with this

methodology.