

RG 1.187, Revision 2
NRC Endorsement to NEI 96-07,
Appendix D

Public Comments Response

Public Meeting
September 18, 2019

Background

- NEI submitted its final revision of NEI 96-07, Appendix D to the NRC on 11/30/18. Letter requesting endorsement submitted 1/08/19
- RG 1.187, Revision 2 (DG-1356), was issued for a 45 day public comment period on 5/30/19. Public comment period closed on 7/15/19
- Public comments were received from three sources:
 - NEI letter dated 7/15/19
 - Entergy Nuclear Operations letter dated 7/15/19 (Endorsed the NEI comment letter)
 - An anonymous letter dated 7/14/19

Clarification on Comments (other than Section C.2.e)

- B. Discussion, Background, Page 5, Para 5:
 - NEI 01-01 in relationship to RIS 2002-22, Supplement 1 and NEI 96-07, Appendix D
- Section C.2.a, NEI 96-07, Appendix D Use:
- Section C.2.b, Human-System Interface (HSI)
 - Screening Process in NEI 96-07 vs Appendix D in regards to HSI
- Section C.2.b, Human-System Interface
- Section C.2.c, Examples Illustrate Guidance
- Section C.2.d, Software Common Cause Failures
- Section 4 of RG 1.187, Rev. 1
 - It will be added back in to Rev. 2

Clarification on Comments (other than Section C.2.e)

- **Entergy Comment Letter**
 - No additional comments
- **Anonymous Comment Letter**
 - Will answer comments in written form. No further discussion is needed.

Section C.2.e

- Discussion on publicly provided comment response paper
- Discussion on publicly provided commented sections of Appendix D
- Examples provided in NEI letter dated July 15, 2019

Next Steps

- Revised Appendix D?
- Additional Public Comment Period?
- Address public comments and update wording as appropriate in RG 1.187 based on the public comments.
- Issue RG 1.187 Revision 2