



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

October 11, 2019

MEMORANDUM TO: Nancy L. Salgado, Chief  
Instrumentation and Controls Branch (A)  
Division of Engineering  
Office of Nuclear Reactor Regulation

Wendell Morton, Acting Chief  
Instrumentation and Controls Branch (B)  
Division of Engineering  
Office of Nuclear Reactor Regulation

Ronaldo V. Jenkins, Chief  
Instrumentation, Controls and Electrical Engineering Branch  
Division of Engineering  
Office of Nuclear Regulatory Research

FROM: Tekia V. Govan, Project Manager **/RA/**  
ROP Support and Generic Communication Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE PUBLIC MEETING ON THE INTEGRATED  
ACTION PLAN TO MODERNIZE INSTRUMENTATION AND  
CONTROLS REGULATORY INFRASTRUCTURE: MODERNIZATION  
PLAN #1D, REVISION TO BRANCH TECHNICAL POSITION 7-19  
HELD ON JUNE 26, 2019

On June 26, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with the Nuclear Energy Institute (NEI) and the nuclear industry to discuss Modernization Plan #1D, to revise Branch Technical Position (BTP) 7-19, "Guidance for Evaluation of Diversity and Defense-In-Depth in Digital Computer-Based Instrumentation and Control Systems," Revision 7 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16019A344). This topic was discussed in the NRC's "Integrated Action Plan to Modernize Digital Instrumentation and Controls Regulatory Infrastructure," Revision 3, updated January 2019 (ADAMS Accession No. ML19025A312).

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Prior to this meeting, NEI provided the NRC staff with comments on the draft BTP 7-19, Revision 7 (ADAMS Accession Nos. ML19135A401 and ML19171A021). The staff reviewed this information and developed questions regarding the document to be discussed during the meeting.

### **Meeting Summary**

NRC and industry management made brief opening remarks, and all attendees introduced themselves.

The NRC staff presented their approach to address the areas of concern identified by NEI (references provided above) as well as focus areas where the staff has identified the need for improvement in the current version on BTP 7-19 (ADAMS Accession No. ML19171A023). The staff discussed the path forward regarding general topic areas such as clarifying the applicability of BTP 7-19 to Title 10 of the *Code of Federal Regulation* (10 CFR) 50.59 and the proposed new risk-informed graded approach and the resolving comments with the definitions of “A1” systems in the proposed graded approach.

Industry stakeholders expressed concerns about the NRC staff’s approach regarding potential spurious actuation evaluation criteria. Industry stated that there is a potential for this analysis to become unbounded due to the possible combinations of failures that could occur. The NRC staff provided additional discussion on its intention to simplify and clarify what is necessary for an adequate determination of safety. This was also discussed by way of a proposed acceptance criteria to address industry’s concerns. However, the discussion on this topic ended with the NRC’s documenting industry’s concern and a recommendation for further public interactions on this topic at the next BTP 7-19 public meeting.

The NRC staff provided some general insights into the comments provided by NEI and provided status to each comment to inform the industry which comments required further clarification from industry. During this discussion, the following clarifications were made:

- Industry clarified that they were looking for additional flexibilities to address Point 3 of Item II.Q of Staff Requirements Memorandum to SECY 93-087.
- Industry stated that they were looking for language that could serve as a “placeholder” for future methodologies that could be submitted to the NRC staff for endorsement in addressing digital common-cause failure and that the potential methodologies would be targeted to ‘A1’ systems associated with a graded approach.
- In terms of strategies such as FLEX, industry clarified that it was only seeking additional flexibilities as part of an overall strategy as described in potential D3 assessment.

The NRC staff engaged in discussion to understand the comments provided for each of the above topics. However, the NRC staff made no decisions or took no agency positions during this meeting.

This meeting was transcribed. The official meeting transcript can be found under ADAMS Accession No. ML19275E802.

### **Conclusion**

At the end of the meeting, NRC and industry management gave closing remarks. NEI expressed appreciation for the open dialogue and willingness of the NRC staff to hear industry views.

The enclosure provides the attendance list for this meeting.

Enclosure:

As stated

SUBJECT: SUMMARY OF THE PUBLIC MEETING ON THE INTEGRATED ACTION PLAN  
TO MODERNIZE INSTRUMENTATION AND CONTROLS REGULATORY  
INFRASTRUCTURE: MODERNIZATION PLAN #1D, REVISION TO BRANCH  
TECHNICAL POSITION 7-19 HELD ON JUNE 26, 2019 DATED

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**ADAMS Accession No.: ML19277H160****\*via e-mail**

<b>OFFICE</b>	NRR/DIRS/IRGB/PM	NRR/DIRS/IRGB/OLA*	NRR/DE/EICB/TR*
<b>NAME</b>	TGovan	IBetts	WMorton
<b>DATE</b>	10/04/2019	10/10/2019	10/11/2019

**OFFICIAL RECORD COPY**

## LIST OF ATTENDEES

### INTEGRATED ACTION PLAN TO MODERNIZE INSTRUMENTATION AND CONTROLS REGULATORY INFRASTRUCTURE: MODERNIZATION PLAN #1D, REVISION TO BRANCH TECHNICAL POSITION 7-19

June 26, 2019, 9:00 AM to 12:30 PM

#### Teleconference

#### ATTENDEE

1. Paul Rebstock
2. Deanna Zhang
3. Paul Kallan
4. Steven Arndt
5. David Desaulniers
6. Robert Beaton
7. Eric Benner
8. Wendell Morton
9. Tekia Govan
10. Maxine Segarnick
11. Rossnyev Alvarado
12. Steve Vaughn
13. Jana Bergman
14. Ronaldo Jenkins
15. Warren Odess-Gillett
16. Clayton Scott
17. Neil Archambo
18. George Hughes
19. Ron Jarrett
20. Kayla Gamin
21. Ray Herb
22. Mark Burzynski
23. Ismael Garcia
24. Stephen Geier
25. Bob Weisman

#### ORGANIZATION

NRC  
NRC  
NRC  
NRC  
NRC  
NRC  
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NRC  
NRC  
NRC  
NRC  
NEI  
Curtiss-Wright  
NRC  
Westinghouse  
Framatome  
Duke Energy  
Framatome  
TVA  
NRC  
Southern Nuclear  
Rolls Royce  
NRC  
NEI  
NRC

#### Participated via conference line

26. Brian J. Thomas
  27. David Neff
  28. John Schrage
  29. Larry Nicholson
  30. Don Chase
  31. Jerry Mauck
  32. Gordon Cleifton
  33. David Heinig
  34. Rob Burg
- Salem and Hope Creek NPP  
Exelon  
Entergy  
Certrec  
Curtiss-Wright  
Member of the public  
Idaho National Laboratory  
Sargent and Lundy  
Engineering Planning and  
Management

Enclosure