

Mr. Gurdziel,

This is in response to your email (attached) to Paul Kallan and the CHAIRMAN Resource sent on November 26, 2019, regarding the final annual update for digital I&C in SECY-19-0112.

The NRC's use of risk-informed approaches help us assure that the probabilities of accidents with the potential for adversely affecting public health and safety are acceptably low. To do this, the agency strives to expand the use of methods to quantify and qualify the risk-importance and safety significance of certain systems, including digital systems. The use of risk-informed approaches may include the integrated consideration of probabilistic risk assessments (PRAs), with safety margins and defense-in-depth in our regulatory decision making. Regulatory Guide 1.174 , for example, describes one type of method for evaluating changes that could include digital I&C. PRAs typically involve the calculation of changes in core damage frequency as one measure of risk. Risk informed approaches may also include applying graded review approaches for digital systems based on their risk and safety significance; in other words, a risk informed review approach will focus agency resources commensurately with the safety significance of the decision and system being reviewed.

A legal review of staff papers to the Commission is standard practice. Stephen West was acting for the Executive Director of Operations and had the delegated authority to sign the paper.

Thank You,
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