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Proposed Revisions to Standard Review Plan Branch Technical Position 7-19 "Guidance for Evaluation of Potential Common Cause Failure in Digital Instrumentation and Control Systems"

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Proposed Revision to Standard Review Plan Branch Technical Position 7-19 Guidance for Evaluation of Potential Common Cause Failure Due to Latent Software Defects in Digital Instrumentation and Control Systems

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General Comment

I have just read through all 32 pages of Branch Technical Position 7 - 19, Rev 8. It is apparent to me that a lot of very serious thinking has gone into this guidance document and I find that very impressive. However there is something missing, (at least in my mind.) All items in Section C, References, come only from the United States. Why is that?

I would like to see that this guidance document takes advantage of the knowledge and perhaps experience of at least five other nuclear plant regulators who have, (or may have), addressed the Digital Instrumentation & Control Common Cause Failure problem in their nuclear fleets. Those five would be, first: France. Next: China. Next: South Korea. Next: Russia. Next: Canada.

It is my understanding that France is currently on their 4th generation of digital I & C. We, here in the USA, aren't even on our 1st!