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January 31, 1997

Chief, Rules Review and Directives Branch
Division of Freedom of Information
and Publication Services
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Updated Standard Review Plan Chapter 7: Availability -
(61 Fed. Reg. 64176 -- December 3, 1996)
Notice of Availability and Request for Comments

These comments are submitted on behalf of the nuclear energy industry by the Nuclear Energy Institute (NEI)¹ in response to the request for comment on Chapter 7 of the updated Standard Review Plan (USRP).

The purpose of our review was to answer the questions noted in the *Federal Register* notice. They are: (1) is the text an accurate reflection of NRC staff positions that have evolved, and (2) is the level of detail appropriate? Our general conclusion is yes to both questions.

The draft USRP spans several hundred pages and is the result of an extensive effort to integrate NRC staff positions derived from digital I&C retrofits at operating nuclear power plants and reviews of advanced light water reactor designs. Several new sections and appendices have been added in this proposed revision. With support from the Electric Power Research Institute, our review focused on these new sections and sections judged to have the greatest potential impact. Lack of specific industry comments on a particular element in the USRP should not be construed to indicate industry review and agreement.

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NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including regulatory aspects of generic operational and technical issues. NEI members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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The proposed document is well organized and clear. Section 7.0 and Appendix 7.0-A are particularly helpful in identifying to an applicant the intended NRC staff review process. The same is true for Appendices 7.1-A, 7.1-B, and 7.1-C, which provide guidance for evaluation of conformance with IEEE Standards 279 and 603. These standards are particularly important, because they deal with protection, safety and important-to-safety systems.

While the USRP chapter does not directly provide detailed guidance, it does appear to integrate by reference the applicable guidance. Given that detailed NRC review of ALWR I&C system designs will occur at a later time (based on design processes specified in the design certifications), we find it appropriate that Chapter 7 relies largely on references to that information rather than including detailed review guidance.

The volume of material in Chapter 7 in combination with the large number of references indicate that a full I&C review is a major endeavor for the NRC and the applicant. To date, NRC and industry experience with I&C reviews conducted in accordance with the referenced guidance documents is limited. We recommend, as we did for the other USRP chapters in our letter of December 31, 1996, that Chapter 7 be published for an extended period of trial use and public comment.

The industry appreciates the opportunity to provide input on Chapter 7 of the USRP. If you have questions, please contact me.

Sincerely,



David J. Modeen

DJM/clp

c: Matthew Chiramal, NRC
Public Document Room (Project Number 689)
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