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October 6, 2021

Ms. Louise Lund
NRC Standards Executive
Office of Nuclear Reactor Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Feedback on NRC's consideration of endorsement of IEEE Std 1819-2016, "Standard for Risk-Informed Categorization and Treatment of Electrical Equipment in Nuclear Facilities"

Project Number: 689

Dear Ms. Lund:

On behalf of our Members, the Nuclear Energy Institute (NEI)¹ offers this input regarding the Nuclear Regulatory Commission (NRC) consideration of endorsement of IEEE Std 1819-2016, "Standard for Risk-Informed Categorization and Treatment of Electrical Equipment in Nuclear Facilities," as documented in your December 26, 2019 letter to Daryl Harmon of the IEEE Nuclear Power Engineering Committee (ML19352E115). This letter notes that the NRC staff will consider assessing feasibility of endorsing IEEE Std 1819-2016, and we understand that the NRC staff has moved forward to potentially endorse this standard.

After extensive consultation with our members, including stakeholders involved with both operating reactors and advanced reactors, NEI urges the NRC to not pursue endorsement of IEEE Std 1819-2016. None of NEI's members have any intent to use this standard in their implementation of 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors," so there appears to be no value in the NRC's endorsement of this standard. Moreover, NEI is concerned that NRC endorsement of IEEE Std 1819-2016 would create an unnecessarily confusing and complicated scenario where licensees would perceive an expectation that mechanical and electrical components be treated differently under 50.69. Finally, given the success licensees have had in categorization under 50.69 without endorsement of such a standard, it is evident that it is not needed to

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

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support implementation of 50.69. In the interests of regulatory stability, NEI strongly recommends that the NRC decline to endorse IEEE Std 1819-2016.

If you have questions concerning this matter, please contact me at vka@nei.org or (202) 739-8101.

Sincerely,

A handwritten signature in dark ink, appearing to read "Victoria K. Anderson", written in a cursive style.

Victoria K. Anderson

C: Mr. Michael Franovich, NRR
Mr. Bob Pascarelli, NRR
Ms. Sheila Ray, NRR
Mr. Khoi Nguyen, NRR
NRC Document Control Desk