



BWROG21-5-001.0r0

PWROG OG-21-210

October 27th 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"

Dear Ms. Lund,

On behalf of our members, the Pressurized Water Reactor Owner's Group (PWROG) and Boiling Water Reactor Owner's Group (BWROG) offer 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 is moving forward to potentially endorse this standard.

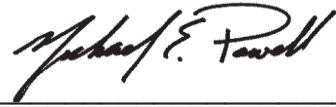
After consultation with our members, both Owner's Group (OG) urge the NRC to not pursue endorsement of IEEE Std 1819-2016. None of our members have any intent to use this standard in their implementation of 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors," so there appears to be no value in NRC endorsement of this standard. In addition, endorsement of the standard, by itself, does not allow use of categorization process by any utility, as the categorization process is specifically approved in each site's License Amendment Request. The OG's are concerned that NRC endorsement of IEEE Std 1819-2016 would create an unnecessary confusion during the inspection process where it could be perceived 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 support implementation of 50.69, and implementation of the standard would only result in a more complicated and costly process with no additional risk insights being provided. The OGs strongly recommend that the NRC decline to endorse IEEE Std 1819-2016.

If you have questions concerning this matter, please contact us.

Sincerely,



Denver Atwood, Chairman
BWROG



Michael Powell, COO & Chairman
PWROG

cc: Michael Franovich, NRR
Bob Pascarelli, NRR
Sheila Ray, NRR
Khoi Nguyen, NRR
Greg Holmes, BWROG
Tony Nowinowski, PWROG