

From: tgurdziel@twcnv.rr.com
Sent: Saturday, February 12, 2022 5:50 PM
To: Jain, Bhagwat; Marshall, Michael
Cc: Screnci, Diane; Gasperson, Dave; Mitlyng, Viktoria; Dricks, Victor; Esberg, John R:(GenCo-Nuc); 'Fellows, David E:(Exelon Nuclear)'
Subject: [External_Sender] Comments on Slides for February 15, 2022 Stakeholder Meeting on Digital I & C Common Cause Failure

Hello,

Thank you for the opportunity to review these presentations ahead of time. I have these comments on the NRC Staff slides. I hope they are addressed during the meeting.

Slide 4 Please define “common mode” and compare/contrast to “common cause”.

Slide 10 How frequently will a loss of safety function always lead to core damage?

Slide 13 Is there a limiting boundary for risk-informed work such that the maximum amount of risk found to be acceptable is clearly identified?

Slide 14 “Risk-based” actions are allowable up to what clearly identified amount of risk?

Slide 17 What is a “beta factor”?

Slide 25 It is my belief that, in order to widely use Digital I & C in the commercial nuclear industry, the regulator, (the US NRC), must supply a specific value below which the occurrence of Digital I & C Common Cause Failure is acceptable. The Consequence Calculation at the very bottom of this slide, in my opinion, does not appear to do this. What it tells me is that I had better have a good containment structure, probably with effective filters such as described in RIC 2012 session TH34.

As written, I do not believe this Consequence Calculation method does what needs to be done to directly address Digital I & C Common Cause failure.

Thank you,

Tom Gurdziel

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