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Comments on DG-1145

1) Section C.1.7 of DG-1145 provides conflicting guidance for the content of a COL that includes digital instrumentation and controls. The description section for the reactor trip system (section C.1.7.2.1), the engineered safety feature system (section C.1.7.3.1), and systems required for safe shutdown (section C.1.7.4.1) state that the applicant should provide logic diagrams, piping and instrumentation diagrams, and location drawings in the COL. This level of detail plus the submittal of the hardware and software architecture description is judged consistent with that required with past license applications based on analog instrumentation and controls. However, some portions of Appendices C.1.7-A and C.1.7-C require additional lower-tier documents to be submitted. Specifically,

- Appendix C.1.7-A, item 19 - "A statistically valid sample of system requirements should be selected to confirm that the applicant/licensee's life-cycle activities have been implemented as planned."
- Appendix C.1.7-A, item 20 - "A statistically valid sample of software design outputs should be provided to confirm with at least 95% assurance that they address the functional requirements and have been allocated to the software appropriately, and to confirm that the expected software development process characteristics are evident in the design outputs."
- Appendix C.1.7-C, item (2) of section C.1.7.C-1 - "One or more sets of these [software life cycle process implementation] reports should be available for each of the following activity groups: requirements, design, implementation, integration, test, installation, operations, and maintenance."

These sections should be revised to clearly state that the COL application should include a description of the software life cycle process, but that submittal of the output documents resulting from these processes is not required. Life cycle process output documents should be available for staff review.

2) The description section for interlock systems important to safety (section C.1.7.6.1) states that schematic diagrams should be provided. Due to the nature of a digital system, a logic diagram is considered more appropriate than a schematic diagram. Therefore, delete the requirement to submit a schematic diagram and substitute a requirement to submit a logic diagram

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