



July 19, 2007
NRC:07:029

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**Response to Second Request for Additional Information Regarding ANP-10272,
"Software Program Manual for TELEPERM XS™ Safety Systems Topical Report" (TAC
No. MD3971)**

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report'," NRC: 06:061, December 21, 2006.

Ref. 2: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Second Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report' (TAC No. MD3971)," June 22, 2007.

Ref. 3: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report' (TAC No. MD3971)," April 27, 2007.

Ref. 4: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report' (TAC No. MD3971)," NRC: 07:020, May 22, 2007.

Ref. 5: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Acceptance for Review of U.S. EPR ANP-10272, 'Software Program Manual TELEPERM XS™ Safety Systems Topical Report' (TAC MD3971)," March 22, 2007.

AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of topical report ANP-10272 Revision 0, "Software Program Manual for TELEPERM XS™ Safety Systems Topical Report," in Reference 1. A second request for additional information (RAI) was provided by the NRC in Reference 2. The responses to these requests are provided in Attachment A to this letter. A previous RAI was provided by NRC in Reference 3 and AREVA NP's responses were provided by Reference 4.

The NRC's acceptance letter (Reference 5) states that NRC expects to issue any additional RAIs by August 31, 2007 and a draft safety evaluation by December 31, 2007. AREVA NP plans to respond to support this schedule. AREVA NP plans to incorporate any report changes associated with resolution of the RAIs in the approved version of the topical report.

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Attachment A to this letter contains security-related sensitive information that should be withheld from public disclosure in accordance with 10 CFR 2.390. The top of each page of Attachment A is marked "Security-Related Information — Withhold Under 10 CFR 2.390" in accordance with Regulatory Information Summary 2005-31. A public version of Attachment A is also provided with the security-related sensitive information redacted.

If you have any questions related to this submittal, please contact Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants Deployment. She may be reached by telephone at 434-832-2369 or by e-mail at sandra.sloan@areva.com.

Sincerely,



Ronnie L. Gardner, Manager
Site Operations and Regulatory Affairs
AREVA NP Inc.

Enclosures

cc: L. J. Burkhart
G. Tesfaye
Project 733

AREVA NP RESPONSE to SECOND REQUEST FOR ADDITIONAL INFORMATION (RAI)

ANP-10272. "SOFTWARE PROGRAM MANUAL FOR TELEPERM XS™ SAFETY SYSTEMS
TOPICAL REPORT" (TAC NO. MD3971) PROJECT NUMBER 733

RAI 29) Question Summary: Will the second U.S. EPR be programmed from scratch, or will software from the first U.S. EPR be reused or adapted for the second? If reuse or adaptation is intended, then how is it described in the SPM?

Full Text: AREVA has stated, in a public meeting, that the application software for the U.S. EPR will be developed in the United States (US). The software development process described in ANP-10272, "Software Program Manual TELEPERM XS Safety Systems Topical Report" (SPM) seems to describe a design from scratch process for application software. However, it is anticipated that one application may contain enough similarities to another that it could appear to be cost effective to start with one application and modify it to make another (e.g. 1st U.S. EPR to 2nd U.S. EPR). Will application software be reused, or adapted from one application to create another? If reuse of application software is anticipated, then please describe how the SPM addresses it. Will the first U.S. EPR application programs be programmed from scratch in the US or will they reuse some of the application code from prior European designs?

AREVA NP Response to RAI 29: Application software is developed using the TELEPERM XS (TXS) Specification and Coding Environment (SPACE) tool. This tool is used to develop Function Diagrams and Network Diagrams. Function Diagrams specify the signal processing requirements for the system. Network Diagrams define the hardware components of the system and their logical interconnections. Software code is automatically generated from the Function Diagrams and Network Diagrams by the SPACE tool. This development process is described in Section 3 of AREVA NP topical report EMF-2110(NP), TELEPERM XS: A Digital Reactor Protection System, Revision 1, (referred to as the TXS topical report).

Function Diagrams and Network Diagrams from one project may be used as a starting point for the design work of another project; however, the design work for each project is developed and issued through the standard design control process for safety-related work, as required by 10 CFR Part 50 Appendix B Criterion III (Design Control). The Function Diagrams and Network Diagrams are subject to independent review through the software verification and validation process. Software code is then automatically generated with the SPACE tool for a project from the project-specific Function Diagrams and Network Diagrams. The application software from one project is not reused for another project.

RAI 30) Question Summary: Please describe the process that will be followed to adapt the software development plans to the version of TELEPERM XS (TXS) that will be used.

Full Text: The versions of hardware and software described in the TXS Topical Report (TR) will not be used for U.S. EPR or other US applications. However, this has not been explicitly stated by AREVA. Does the SPM assume that the TXS platform that will be used is the one that has been approved? If not, please describe the version of TXS that the SPM is applicable to.

Also, if the applicable version TXS is not a currently approved version, then please describe the plans to adapt the SPM to the approved version that will be used.

AREVA NP Response to RAI 30: Topical report ANP-10272, "Software Program Manual for TELEPERM XS™ Safety Systems", (referred to as the TXS Software Program Manual) is written to support implementation of all versions of the TXS platform. The TXS Software Program Manual does not require any changes to adapt to later versions of the TXS platform.

Advances in digital technology have resulted in revisions to the TXS platform since the TXS topical report was initially submitted in 1999. These enhancements take advantage of advancements in technology and increase processing power. There are three hardware components that are different than those in use when the TXS topical report was reviewed:

- the SVE1 (Control Processor),
- the SCP1 (Ethernet Communication processor), and
- the SBG1 (Equipment sub-rack upgrades with new model numbers).

The current software is different than the version available when the TXS topical report was reviewed; however, it utilizes the same architecture and is comprised of the same software components (though with upgrades to some components) as the software in use when the TXS topical report was reviewed. The software changes include:

- Extension of Function Block Library to add new functionality,
- Upgrade to the SVE2 processing module, which supports shorter cycle times, and
- Modified hardware interface software to support both SVE1 and SVE2 processor modules.

These software changes were developed with the same testing and qualification controls in use when the TXS topical report was reviewed. These software changes were made in accordance with the software configuration management program described in the section 3.2 of the TXS topical report. None of the software changes were required to correct problems identified during system operation.

The Design Control Document will specify the functional requirements and network architecture. It is recognized that TXS hardware and software will continue to evolve as technology changes. As noted in section 2 of AREVA NP topical report ANP-10281P, Revision 0, "U.S. EPR Digital Protection System," each applicant must demonstrate that the equipment and software used in the as-built system adheres to the TXS design principles and methods approved by NRC in the safety evaluation report for the TXS topical report. The Design Control Document will specify the use of the TXS platform. Specific versions of the TXS platform will be addressed as an element of an Inspections, Test, Analyses, and Acceptance Criteria item. Similarly, licensees that submit license amendments that support plant modifications will specify the versions of the TXS platform planned for use.

RAI 31) Question Summary: Please describe how the SPM is coordinated with the processes and procedures used to establish reasonable assurance that the desired product will be produced.

Full Text: In Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50, Appendix B: "The pertinent requirements of this appendix apply to all activities affecting the safety-related functions of those structures, systems, and components; these activities include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying. As used in this appendix, "quality assurance" comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service." Therefore, the software development plans are part of the quality assurance (QA) program. However, the SPM does not describe how the software development plans fit into the rest of the AREVA QA program. Please describe how the software development plans are coordinated with the QA program.

AREVA NP Response to RAI 31: The AREVA NP Quality Management Manual (QMM) is the upper tier corporate document that defines the quality requirements, including safety-related design work in the U.S. The QMM is written to comply with the following codes, regulations and standards:

International code

- I.A.E.A. 50-C-Q (1996) Quality Assurance for Safety in Nuclear Power Plants and other Nuclear Installations (I.A.E.A. - International Atomic Energy Agency)

National standards and regulations

- Order of August 10, 1984 Order of August 10, 1984 relative to the quality of the design, construction and operation of Basic Nuclear Facilities (French Regulation)
- KTA 1401 (06/96) General Requirements Regarding Quality Assurance (KTA Kerntechnischer Ausschuss = German Nuclear Safety Standards Commission)
- 10 CFR 50 Appendix B Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants (U.S. Regulation)
- ANSI/ASME NQA-1-1983 and 1994 Quality Assurance Program Requirements for Nuclear Facilities (ASME – American Society of Mechanical Engineers)

For the US Region, the compliance with ANSI/ASME NQA-1-1994 is ensured through implementing procedures.

AREVA NP's implementation of the QMM is periodically audited by the Nuclear Procurement Issues Committee (NUPIC). The NUPIC program evaluates suppliers furnishing safety-related components and services and commercial grade items to nuclear utilities. The most recent NUPIC audit of AREVA NP was performed in November 2006.

The QMM also allows for the issuance of quality assurance plans to augment the quality requirements for a specific customer or project. AREVA NP Topical report ANP-10266A,

Revision 01, "AREVA NP Inc. Quality Assurance Plan (QAP) for Design Certification of the U.S. EPR," (referred to as the U.S. EPR Quality Assurance Plan) was issued to describe the Quality Assurance Plan applicable to the Design Certification of the U.S. EPR. The plan is based on the eighteen point criteria of 10 CFR 50, Appendix B, and ANSI/ASME NQA-1-1994. NRC issued a safety evaluation report for this topical report in a letter from Getachew Tesfaye to Ronnie L. Gardner dated April 26, 2007.

The TXS Software Program Manual describes the program measures incorporated by AREVA NP to ensure that the TXS application software attains a level of quality commensurate with its importance to safety functions, performs the required safety functions correctly, and conforms to established technical and documentation requirements, conventions, rules, and industry standards. The TXS Software Program Manual applies to application software developed for all TXS projects in the U.S., including U.S. EPR projects.

The TXS Software Program Manual requires that a Software Quality Assurance Plan be developed. The TXS Software Quality Assurance Plan describes the necessary measures to make sure that the developed TXS application software conforms to established technical requirements, rules, and standards. It also describes the tools to be used and methodology to be followed in developing and maintaining software to be used for the design of TXS application software.

TXS application software elements produced in this process include:

- Test plans, cases, procedures, and reports
- Review and audit results
- Problem reports and corrective action documentation
- Software Configuration Management Plans
- Software Verification and Validation Plans
- Software Safety Plans
- Design Documents
- Application Code

Compliance with the TXS Software Program Manual is ensured through operating instructions.

All design work, products and services provided for a TXS project are performed to the requirements of the AREVA NP Quality Management Manual. TXS application software is also produced in accordance with the requirements defined in the TXS Software Program Manual. The TXS application software documents conform to the additional quality assurance requirements defined in the TXS Software Quality Assurance Plan. Work performed for the U.S. EPR also complies with the requirements defined in the U.S. EPR Quality Assurance Plan.

Project documentation used as design input or delivered to the customer as design output is stored in the AREVA NP records management system. Similarly, project records arising from QA inspections and audits are stored in the AREVA NP records management system. The record storage requirements are described in the AREVA NP Records Management Program Manual.

RAI 32) Question Summary: Please describe how the SPM ensures that the software development plans produced will satisfy the acceptance criteria identified in Branch Technical Position (BTP) No. 14.

Full Text: BTP No. 14 identifies acceptance criteria for process planning. These acceptance criteria are grouped into three groups of characteristics: Management, Implementation, & Resource. The SPM does not seem to contain requirements that these desirable characteristics are achieved.

AREVA NP Response to RAI 32: As noted in Section 1 of the TXS Software Program Manual, the TXS Software Program Manual establishes the requirements and objectives for the Software Quality Assurance Plan, Software Safety Plan, Software Verification and Validation Plan, Software Configuration Management Plan, and Software Operations and Maintenance Plan. These five plans are implemented as AREVA NP operating instructions and conform to the requirements established in the Software Program Manual. In some cases additional operating instructions will be used to define specific implementation details. The combination of the TXS Software Program Manual and the five plans above constitute a program that conforms to the guidance of Branch Technical Position (BTP) Human, Instrumentation and Controls Branch (HICB)-14, Guidance on Software Reviews for Digital Computer-Based Instrumentation and Control Systems, dated June 1997.

See response to RAI 6 provided in AREVA NP letter number NRC: 07:020 dated May 22, 2007, from, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report," for additional alignment of the TXS Software Program Manual with BTP HICB-14. Also, see response to RAI 31 above for additional information on how the TXS Software Program Manual fits within the overall AREVA NP Appendix B quality assurance program.

RAI 33) Question Summary: Please describe any suggestions that AREVA will provide to the customers on how to address cyber security in the latter life cycle phases.

Full Text: SPM, Section 9.3 says: "The guidance of Regulatory Guide 1.152 is implemented as follows: Items C.2.6 through C.2.9 specify guidance to be addressed by the customer and do not apply to AREVA NP." However, it is expected that some aspects of cyber security are TXS specific, and, therefore, AREVA may be in the best position to provide recommendations on TXS specific cyber security measures in latter life cycle phases.

AREVA NP Response to RAI 33: The key cyber security features of the standard TXS platform are contained within the design of the processors and operating system and associated access control features. The standard TXS design is envisioned to be installed within a secure area; however, the design has optional design capabilities to augment the standard access control features, if a higher level of access control is required for any equipment installed in less secure areas, as described in TXS topical report section 2.6.

AREVA NP recognizes that the Nuclear Energy Institute has issued document NEI 04-04, "Standard Cyber Security Program for Operating Reactors," to address a method of compliance

pending rule change 10 CFR 73.55(m), "Digital computer and communication networks." This document addresses the topics associated with items C.2.6 through C.2.9 from Regulatory Guide 1.152, "Criteria for Use of Computers in Safety Systems of Nuclear Power Plants," Revision 2.

RAI 34) Question Summary: Please describe the process models that will be used and the types of simulations that will be conducted in the software development process.

Full Text: SPM, Section 1.4 says: "SIVAT [Simulation based Validation Tool] ... Process models can also be linked into the simulator to perform closed-loop tests." This statement says what can be done. However, it is not clear what will be done, or what is required by the SPM to be done.

SPM, Section 4.3.6 says: "The SIVAT testing and its results confirm that the software design is consistent with a basis from the safety analysis." Is it currently planned to use process models and simulate each function credited in the Safety Analysis Report? If not, please explain the analysis used to bridge the gap between what will be tested and what will be credited.

AREVA NP Response to RAI 34: The use of process models is a project-specific decision that is addressed in the project software test plan. Closed loop process models would be used to support testing of control loops. Process models are not used to test actuation logic used for reactor protection systems or engineered safeguards features actuation systems. Project software test plans are developed to specify the necessary testing for the specific functionality implemented in the project application software. The specified SIVAT testing confirms the requirements as set forth in the Software Requirements Specification and the Functional Requirements Specification, which are defined by the safety analysis or other system control requirements.

RAI 35) Question Summary: Please describe the development process of the SIVAT.

Full Text: Section 5.1.2 of the TXS TR says: "The development of each component and of each tool shall follow a development process, which consist of six phases ..." The SPM describes the use of the SIVAT tool. The SIVAT tool was not described in the TXS TR. Please describe how the development process of the SIVAT addresses the requirements in the TXS TR.

AREVA NP Response to RAI 35: SIVAT was developed based on a requirements specification and technical specification document. The development process follows AREVA NP GmbH procedure F-AW-TXS 1.1 "Software Lifecycle Processes". The validation of the product was performed with tests of a real TXS application (data from a test) and the results of a SIVAT simulation of the same application. Changes to the SIVAT tool are controlled via AREVA NP GmbH procedure F-AW-TXS 1.5a "Configuration Management," which establishes requirements to ensure that changes are controlled, documented, and tested. AREVA NP has operating experience with the use of SIVAT for more than 20 project specific applications.

See response to RAI 1 provided in AREVA NP letter number NRC: 07:020 dated May 22, 2007, from, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a

Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report.'

RAI 36) Question Summary: Please describe any cyber security assessments of TXS and any associated actions to address concerns identified. Note: The response to this question may contain safeguards information and if so, must be treated appropriately.

Full Text: Cyber security concerns can be addressed either in hardware or in software. The TXS system may have cyber security concerns that have been identified in previous assessments. . AREVA must have a plan to address these concerns, and to the extent that these concerns are addressed in software, then the plans that will be developed in accordance with the SPM must address these concerns. Please describe how the plans developed in accordance with the SPM will address cyber security concerns.

AREVA NP Response to RAI 36: The TXS system provides a robust and multi-layered approach to addressing the issue of cyber security. The standard TXS system is described in the TXS topical report. The report describes both the design features and development process for the TXS hardware platform and operating system. The development process for TXS application software for U.S. projects is described in the TXS Software Program Manual. Cyber security for the TXS system is addressed through robust design features of the TXS hardware platform and operating system (including the function block library), process controls for software developed by AREVA NP in Germany, and process controls for software developed by AREVA NP in the U.S.

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in Accordance with 10 CFR 2.390**

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RAI 37) Question Summary: Please describe how the SPM addresses the need to update the software development plans.

Full Text: NUREG-0800 Chapter 7, BTP No. 14 assumes that a certain process will be followed in developing digital computer-based instrumentation and control systems. This process includes three aspects: 1) development of project specific plans, 2) following the plans, and 3) assessing that the results produced are acceptable. BTP No. 14 provides acceptance criteria for each of these aspects. The following paragraphs are included to demonstrate that the BTP No. 14 concept of the plans is that they are project specific and adaptable.

Section A.3.1.2 of BTP No. 14 contains a definition of the implementation characteristics, which includes: "Schedule - The time order of events necessary to achieve the purpose of the planning document, given either as absolute dates ..." A schedule that includes absolute dates is applicable to project specific activities and not to project neutral items.

Section A.3.1.3 of BTP No. 14 contains a definition of the resource characteristics, which includes: "Budget - The financial resources necessary to carry out the work." A plan that includes a budget is applicable to project specific activities and not to project neutral ones.

Section A.3.1.3 of BTP No. 14 contains a definition of the resource characteristics, which includes: "Personnel - The numbers ... of personnel required to carry out the work defined in the planning document." A plan that includes the number of personnel is applicable to project specific activities and not to project neutral ones.

NUREG/CR-6101 says: "Planning activities result in the creation of a number of documents that are used to control the development process." The implication is that planning activities are documented in plans. It is anticipated that each project will be planned.

Section B.3.1.1 of BTP No. 14, "Acceptance Criteria for Software Management Plan (SMP)," identifies that Regulatory Guide 1.173 endorses IEEE Std. 1074-1995, subject to provisions listed. IEEE Std. 1074-1995, Clause 3.1.6, "Plan Project Management," says: "As new or revised Input Information is received in this Activity, project plans shall be updated and further project planning shall be based upon these updated plans."

Section B.3.1.10 of BTP No. 14, "Software Verification and Validation Plan (SVVP)," identifies that Regulatory Guide 1.168, Revision 1, endorses IEEE Std. 1012-1998, "IEEE Standard for Software Verification and Validation," as providing methods acceptable to the staff for meeting the regulatory requirements as they apply to verification and validation of safety system software, subject to the exceptions listed.

IEEE Std 1012-1998, Section 5.1.1 says: "The management of V&V activities is performed in all software life cycle processes and activities. This activity continuously reviews the V&V Effort, revises the SVVP as necessary based upon updated project schedules and development status ..."

Section B.3.1.10 of BTP No. 14, "Software Configuration Management Plan (SCMP)," identifies that Regulatory Guide 1.169, "Configuration Management Plans for Digital Computer Software

Used in Safety Systems of Nuclear Power Plants," endorses IEEE Std. 828-1990, "IEEE Standard for Configuration Management Plans," as providing an acceptable approach for planning configuration management. IEEE Std 828-1990 Section 2.6, "SCM Plan Maintenance," says: "The Plan should be reviewed at the start of each project software phase, changed accordingly, and approved and distributed to the project team."

AREVA NP Response to RAI 37: The TXS Software Program Manual defines the software development plans required to implement to the TXS application software development program. Project specific plans are either developed or utilize the generic Operation Instruction implementation. This is further defined in the associated Operating Instruction or Procedure. The project plan is a requirement of the AREVA NP Projects Manual, as described in section 2.1.2 of the TXS Software Program Manual. The project plan is updated as required throughout the life of a project. A project plan addresses the following topics: Scope, Schedule, Budget, Quality, Human Resources, Communications, Risk and Procurement.

Sections 5 and 6 of the TXS Software Program Manual discuss the Software Configuration Management Plan and Software Verification and Validation Plan activities, respectively. The implementing Operating Instruction and any associated project-specific plans are updated as required for improvements or changes in the process. Whenever changes to project specific procedures or Operating Instructions they are distributed to the appropriate team members for use.

See response to RAI 13 provided in AREVA NP letter number NRC: 07:020 dated May 22, 2007, from, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report.'"

RAI 38) Question Summary: Please explain how the SPM describes the incorporation of information from the new nuclear plant implementation process.

Full Text: In the letter that Areva sent to the NRC submitting the SPM for review, AREVA stated: "AREVA NP intends to use the Software Program Manual to support digital safety instrumentation and control (I&C) system upgrades at operating nuclear plants and digital safety systems for new nuclear plants." However, the SPM does not describe how the information produced as part of the 10 CFR 52 licensing process is used in the software development process. What information relative to the software development process will be in the certified design? Where will that information be located? How will the information in the certified design be used in the software development process? What information relative to the software development process will be in the Combined Operating Licence (COL)? Where will that information be located? How will the information in the COL be used in the software development process?

AREVA NP Response to RAI 38: 10 CFR 50.55a(h) requires compliance with IEEE-603-1991, "Criteria for Safety Systems in Nuclear Power Plants," for digital protection systems. Compliance with the requirements in IEEE 603-1991 is established through the standard design control process for safety-related work, as required by 10 CFR Part 50 Appendix B Criterion III (Design Control). In general, the functional requirements for the safety-related digital protection

and control systems are described in Chapter 7 of the Design Control Document for certified designs. This information is generally contained in logic and control diagrams provided in the Design Control Document. The results of the failure modes and effects analysis and response time analysis design activities that ensure that the single failure requirements are satisfied and safety analysis assumptions are satisfied.

These functional requirements are an input to the Functional Requirements Specification and then the Software Requirements Specification. The software development process described in ANP-10272 addresses the translation of the functional safety requirements into the final application software. Application software is developed using the TELEPERM XS Specification and Coding Environment (SPACE) tool. This tool is used to develop Function Diagrams and Network Diagrams. Function Diagrams specify the signal processing requirements for the system. Network Diagrams define the hardware components of the system and their logical interconnections. Software code is automatically generated from the Function Diagrams and Network Diagrams by the SPACE tool.

The Design Control Document will specify the functional requirements and network architecture. It is recognized that TXS hardware and software will continue to evolve as technology changes. As noted in section 2 of AREVA NP topical report ANP-10281P, Revision 0, "U.S. EPR Digital Protection System," each applicant must demonstrate that the equipment and software used in the as-built system adheres to the TXS design principles and methods approved by NRC in the safety evaluation report for the TXS topical report. The specific versions of the TXS platform will be specified in the Combined Operating License application, either directly or as an element of an Inspections, Test, Analyses, and Acceptance Criteria item.

See responses to RAIs 5, 7, 22 and 25 provided in AREVA NP letter number NRC: 07:020 dated May 22, 2007, from, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding ANP-10272, 'Software Program Manual for TELEPERM XS™ Safety Systems Topical Report.'" Also, see response to RAI 29 above.