December 11, 2008

MEMORANDUM TO: Patricia A. Silva, Chief
Technical Support Branch
Special Projects and Technical
Support Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

FROM: David L. Rahn, Sr. I&C Engineer **/RA/**
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SUBJECT: SUMMARY OF THE NOVEMBER 13, 2008, CATEGORY 2 PUBLIC MEETING AND TELECONFERENCE WITH THE NUCLEAR ENERGY INSTITUTE AND INDUSTRY, TO DISCUSS TASK WORKING GROUP #7, DIGITAL INSTRUMENTATION AND CONTROL FOR FUEL CYCLE FACILITIES

On November 13, 2008, Task Working Group (TWG) #7, held a Category 2 public meeting and teleconference to discuss various issues related to the development of guidance for the review of license applications for fuel cycle facilities concerning the use of digital instrumentation and control (I&C) equipment in safety applications. Specifically, license review criteria contained in the draft Interim Staff Guidance (ISG) developed in response to problem statements proposed by the TWG were discussed.

A discussion was held regarding the revised ISG Problem Statement 1, pertaining to cyber security. Mr. Killar commented that a simpler approach for this ISG would be one that focuses only on the Part 70 aspects of the code, rather than try to account for the several differences identified within Part 73 among the requirements for Category 1 facilities and Category 3 facilities. The U.S. Nuclear Regulatory Commission (NRC) staff requested that Mr. Killar provide a mark-up of this ISG.

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A general discussion took place regarding whether there is still a need for an ISG that deals with Defense-in-Depth and Diversity as had been planned, for addressing Problem Statement 2. The reason for this discussion was that the ISG developed for Problem Statement 3, already addresses defense-in-depth and diversity in its discussions on independence. It was generally agreed by the TWG members and industry participants that there was no need for a stand-alone ISG pertaining to the defense-in-depth and diversity. The Digital I&C Project Plan will be revised to indicate that there will be no ISG for Problem Statement 2, since the ISG for Problem Statement 3 adequately addresses the issues for this topic.

A discussion was held regarding the latest revision to Problem Statement 3. The NRC staff pointed out that this revision now discusses the concept of “fail safe” design. Mr. Prytherch stated that one key design criteria regarding the use of a control system certified by a third-party certifying organization, be implemented in accordance with the certifying organization’s “safety manual.” This manual typically describes the conditions and boundaries under which the certification has been performed. He also pointed out that the statement regarding “testability” would only apply to a system that was “sufficiently simple” to enable this testing.

A discussion regarding the latest version of Problem Statement 5 was held. This document identifies NQA-1 as the guidance to follow when identifying software quality requirements. Mr. Smith noted that the NQA-1 2008, Subpart 2.7, issued in March 2008 would be the current appropriate version. He also stated that the footnotes that used to appear at the bottom of the first page discussing software quality that referred to applicable NRC guidance have been removed from this document, and the text has been revised. This version is targeted for NRC endorsement by December 2009.

The NRC staff requested that all TWG members and participants provide comments on a new ISG that has been prepared to address Problem Statement 4, before the next meeting. Mr. Killar requested that the TWG develop guidance pertaining to the use of Digital I&C as a “sole items relied on for safety” as defined in 10 CFR 70.65 (a)(8).

The next public meeting will be a teleconference on Wednesday, December 10, 2008.

ACTION ITEMS:

Item	Description	Responsibility
1.	Provide mark-up of ISG for Problem Statement 1 to address Part 70 requirements rather than Part 73 requirements.	Felix Killar
2.	Schedule visit to AREVA Richland, WA fuel manufacturing facility	David Rahn
3.	Provide comments on ISGs for Problem Statements 1, 3, 4, and 5	TWG members and Industry Participants
4.	Update and re-issue drafts of Problem Statements 1, 3, 4 and 5	NRC Staff

PARTICIPANTS

NRC and external stakeholders, including members of NEI, industry representatives, consultants to the nuclear industry, and interested members of the Public:

NRC

D. Rahn
S. Bailey
D. Edwards
W. Smith

Industry

Felix Killar, NEI
Janet Schlueter, NEI
Charlie Vaughan, GE-Hitachi*
Scott Murray, GE-Hitachi*
Ed Prytherch, Westinghouse*
Steve Powers, Areva*

Public Participant
Richard Bockhorst, IPS/ Invensys

* Attended via teleconference
cc: Glen H. Smith, GE-Hitachi

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