

Talking Points for AREVA SPM Meeting

16 June 09

1. Revisiting the RAIs
 - i) Reiteration of NRC Concern #1 of 7 March Letter
 - ii) AREVA was to designate exact change for "each" RAI response
 - iii) Comment blocks in Draft 1 identify 37 of 87 RAIs
 - iv) 50 RAIs do not affect SPM???

Also:

 - v) RAI 6 –Identify and Analyze Differences with SRP – Per 10 CFR 50.34(h)
 - (a) Identifies 14 exceptions with SRP
 - (b) Response needs updated
 - (c) Document 51-9047411-000, which analyzes the exceptions, should be docketed
2. Cyber Security Concerns in the SPM with regards to RG 1.152
 - i) Regulatory positions 2.1, 2.2, 2.4 need addressed;
 - (a) RP 2.1; Assessments
 1. In what phases will assessments be done?
 2. How will they be performed; including threat vector analysis to identify all the pathways that can be exploited?
 - (b) RP 2.2; Predeveloped Software and Systems
 1. Vulnerability analysis of TXS (previously developed SW) should be performed
 - (c) RP 2.4; Account for hidden functions and vulnerable features embedded in code
 1. AREVA has controls to prevent external contamination
 2. Demonstration that TXS & Application SW is free of hidden or malicious code (e.g. time bombs, logic bombs, etc.)
 3. Describe V&V process & CM program to detect & facilitate removal of hidden code from the developed software
3. Current Status of Oconee LAR/ SER & the resulting potential Impacts
 - (a) Draft 1 of SPM, as a result of Oconee review, included these plans:
 1. Software Integration Plan
 2. Software Installation Plan
 3. Modified V&V Methods
 - (b) Input from NRR, on preliminary SER exceptions to guidance & standards
4. Level of detail of SPM, Conformance to Standards & Consistency with OI's
 - (a) What degree of conformance to referenced Stds is the SPM?
 - (b) Were exceptions to Stds taken; if so justified?
 - (c) Can a requirements traceability analysis be done between SPM & Stds?
 - (d) Meeting Stds requirements may only be reviewed in Implementation docs
What method would staff use in confirming requirements?
 - (e) What methods used to ensure consistency between SPM and OI's?

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- (f) SERs depend on vendor planning and licensee's plan & implement docs
- (g) SMP standardizes vendor side but applicant needs set of application specific documents

Example: SW Configuration management becomes the licensee's responsibility once the system is turned over from the vendor. In this case, the staff would like to review the SW CM plans to determine that adequate CM control will be maintained through this transition and into the O&M phase of the software. The same applies for other aspects of the SW such as V&V, SQA, and SSP.

- 5. Therefore, SER Approval of SPM necessitates;
 - (a) Separate approval req'd of project plans & operating instructions;
 - (b) Or; include level of detail of project plans & operating instructions in SPM
 - (c) Example: Level of detail to meet IEEE 1012 – See discussion

- 6. Forward Path on Engineering Tools
 - (a) Draft 1 references SIVAT in:
 - 1. Section 11.2.5, Resources for V&V Plan, &
 - 2. Section 11.2.7.3, Design Phase V&V
 - (b) Draft 1 references "NRC approved simulation test tool"; - several places
 - 1. Validation of SW tools provide sufficient confidence; or
 - 2. Defects not detected by tool will be detected by V&V activities

- 7. Forward Path on entire SPM
 - (a) Finalization of Oconee SER
 - (b) Docketed Revision of SPM
 - (c) Discussion and Revision of SPM