

i n v e n s y s
Operations Management

Letter No. NRC-V10-12-004

May 15, 2012

United States Nuclear Regulatory Commission
Mr. Jonathon Rowley, Project Manager
M/S 12D2
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Nuclear Safety Related Qualification of the Tricon TMR Programmable Logic Controller (PLC)
– Update to Qualification Summary Report Submittal (TAC NO. ME2435)

References:

1. Letter, J. Polcyn (Invensys) to NRC, June 1, 2009, subject: NRC Safety Evaluation Report, “Review of Triconex Corporation Topical Reports 7286-545, Qualification Summary Report, and 7286-546, Amendment 1 to Qualification Summary Report, Revision 1”, Letter No. NRC-V10-09-001.
2. Letter, NRC (R. A. Nelson) to B. Haynes (Invensys), dated April 12, 2012, subject: “Final Safety Evaluation for Invensys Operations Management ‘Triconex Topical Report’ (TAC NO. ME2435)”

Dear Mr. Rowley:

Reference 2 provided the staff’s final Safety Evaluation Report (SER) for the V10 Tricon platform upgrade to Invensys Operations Management (Invensys). In the transmittal letter, the staff requested that within three months of the date of the letter Invensys publish approved versions (proprietary and non-proprietary) of the Triconex Topical Report. The purpose of this letter is to transmit the requested approved version of the report, i.e., “Triconex Approved Topical Report, 7286-545-1-A, Rev. 4.”

As noted in Attachment 1, the Triconex Approved Topical Report is provided as an Enclosure to this letter. The report contains the staff’s final SE and the April 12, 2012, transmittal letter (Reference 2). In addition, the NRC Request for Additional Information (RAI) and the Invensys response are summarized in the report. The Triconex Approved Topical Report is considered fully non-proprietary (public), and therefore no proprietary version is provided.

A comprehensive listing of documents submitted to the staff is provided in this submittal as Attachment 2 to ensure a common understanding of the documents and their versions reviewed by the staff.

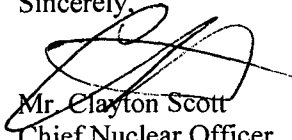
If there are any further questions regarding the publishing of the Triconex Approved Topical Report, correspondence with should be directed to the following:

Invensys Operations Management
Attn: Clayton Scott
Chief Nuclear Officer
26561 Rancho Parkway South
Lake Forest, California 92630

D062
NRR

The staff has worked diligently to complete the SER over the past several months, overcoming difficult challenges presented by unexpected events. I would like to express my appreciation to the staff for maintaining progress on the V10 Tricon safety evaluation, including the continued open and productive communications with us in the face of these challenges.

Sincerely,



Mr. Clayton Scott
Chief Nuclear Officer
Invensys Operations Management

cc: Mr. John Jolicoeur, Branch Chief – NRR
Mr. James Thorpe, Branch Chief – NRR
Mr. Christopher Wiegand – Invensys – Letter Only
Mr. Richard Lilleston – Invensys – Letter Only
Mr. Brian Haynes – Invensys – Letter Only
Mr. Roman Shaffer – Invensys – Letter Only

Attachment/Enclosures: as stated

**ATTACHMENT 1
Enclosure Listing – CD 30 Content**

<i>Enclosure Description</i>	<i>CD30</i>	<i>[filename] [size MB]</i>
<u>Enclosure 1</u> – Triconex Approved Topical Report		
Triconex Approved Topical Report, 7286-545-1-A, Rev 4	X	<i>[165_Tcx_App_TR.pdf] [4.1]</i>

Note:
Enclosure contains no proprietary information.

ATTACHMENT 2

Document Submittals to the NRC
(05/15/12)(Current document file status - sorted by filename number)

(bold=most recent change)

Document Description	Prop CD*	Public CD	[filename] [size MB]	Trans Letter (s)	Date sent, final
- Affidavit #TCXNRC-09-01	1c	2c	[001E1_Affidavit.pdf] [0.3]	(-001, -002) -003	[10/5/09]
			----(002 Deleted - see History)		
Differences between the Tricon V9.5.3 and the Tricon V10.2.1 System – NTX-SER-09-05, Rev 2*	12		[003R2_DiffV9V10_P.pdf] [1.2]	-10-004	[04/09/10]
EQ Summary Report 9600164-545, Rev 3*	8		[004R2_EQSummaryRep_P.pdf] [1.4]	-10-001	[01/05/10]
- Appendix A	3c	4c	[005R1_EQSR_AppA.pdf] [0.9]	(-004) -007	[11/17/09]
- Appendix B	3c	4c	[006R1_EQSR_AppB.pdf] [0.4]	(-004) -007	[11/17/09]
- Appendix C	3c	4c	[007R1_EQSR_AppC.pdf] [0.4]	(-004) -007	[11/17/09]
Software Qualification Report (SQR) – 9600164-535, Rev 1*	8		[008R2_SQR_P.pdf] [1.7]	-10-001	[01/05/10]
Critical Digital Review (CDR) – 9600164-539, Rev 1*	1c		[009E3_CDR_P.pdf][1.8]	(-001, -002) -003	[10/5/09]
SER Maintenance Process – NTX-SER-09-020, Rev 1	12	13	[010R1_SERMaint.pdf] [0.2]	-10-004	[04/09/10]
Nuclear System Integration Program Manual – NTX-SER-09-21, Rev 1*	16		[011R1_NSIPM_P.pdf][0.9]	-10-006	[07/11/10]
Compliance with NRC Interim Guidance ISG-2 and ISG-4 – NTX-SER-09-010, Rev 3**	26	27	[012R3_ISG24Rev3_NP.pdf] [1.2]	-12-002	[02/07/12]
Invensys Conformance to Reg Guide 1.152 Rev 2 – NTX-SER-10-14, Rev 0	16	17	[013R1_RG1152.pdf] [0.7]	-10-006	[07/11/10]
			----(014 Deleted- see History)		
Differences between the Tricon V9.5.3 and the Tricon V10.2.1 System – NTX-SER-09-05, Rev 2 **	12	13	[015R2_DiffV9V10_NP.pdf] [0.9]	-10-004	[04/09/10]
EQ Summary Report 9600164-545, Rev 3**	8	9	[016R2_EQSummaryRep_NP.pdf] [2.0]	-10-001	[01/05/10]
			----- (017,018,019 Deleted)		
- Software Qualification Report (SQR) – 9600164-535, Rev 1**	8	9	[020R2_SQR_NP.pdf] [3.3]	-10-001	[01/05/10]
- Nuclear System Integration Program Manual – NTX-SER-09-21, Rev 1**	16	17	[021R1_NSIPM_NP.pdf][0.7]	-10-006	[07/11/10]
			----(022 Deleted by 013R1)	-10-006	[07/11/10]
Enclosure 1: - Affidavit #TCXNRC-09-02	3c	4c	[023_Affidavit2.pdf] [3.0]	(-004) -007	[11/17/09]
Environmental Test Report 9600164-525, Rev 0*	8		[024R1_EnvTestRep_P.pdf] [1.6]	-10-001	[01/05/10]
Environmental Test Report 9600164-525, Rev 0**	8	9	[025R1_EnvTestRep_NP.pdf] [1.9]	-10-001	[01/05/10]
Seismic Test Report 9600164-526, Rev 0*	8		[026R1_SeisTestRep_P.pdf] [1.3]	-10-001	[01/05/10]
Seismic Test Report 9600164-526, Rev 0**	8	9	[027R1_SeisTestRep_NP.pdf] [0.7]	-10-001	[01/05/10]
EMI/RFI Test Report 9600164-527, Rev 3*	28		[028R3_EMIRep_P.pdf] [1.2]	-12-003	[02/10/12]
EMI/RFI Test Report 9600164-527, Rev 3**	28	29	[029R3_EMIRep_NP.pdf] [0.7]	-12-003	[02/10/12]
Surge Withstand Test Report9600164-528, Rev 1*	8		[030R1_SurgeRep_P.pdf] [1.5]	-10-001	[01/05/10]
Surge Withstand Test Report9600164-528, Rev 1**	8	9	[031R1_SurgeRep_NP.pdf] [2.5]	-10-001	[01/05/10]
IE Isolation Test Report 9600164-529, Rev 1*	8		[032R1_IEISORep_P.pdf] [1.45]	-10-001	[01/05/10]
IE Isolation Test Report 9600164-529, Rev 1**	8	9c	[033R1_IEISORep_NP.pdf] [2.5]	-10-001	[01/05/10]

<i>Document Description</i>	<i>Prop CD*</i>	<i>Public CD</i>	<i>[filename] [size MB]</i>	<i>Trans Letter (s)</i>	<i>Date sent, final</i>
EFT Test Report 9600164-521, Rev 1*	8		[034R1 EFTRep P.pdf] [1.5]	-10-001	[01/05/10]
EFT Test Report 9600164-521, Rev 1**	8	9	[035R1 EFTRep NP.pdf] [2.5]	-10-001	[01/05/10]
ESD Test Report 9600164-522, Rev 1*	8		[036R1 ESDRep P.pdf] [1.7]	-10-001	[01/05/10]
ESD Test Report 9600164-522, Rev 1**	8	9	[037R1 ESDRep NP.pdf] [1.5]	-10-001	[01/05/10]
Performance Proof Test – Operation 9600164-566, Rev 0*	8		[038R1 PPOpsRep P.pdf] [2.3]	-10-001	[01/05/10]
Performance Proof Test – Operation 9600164-566, Rev 0**	8	9	[039R1 PPOpsRep NP.pdf] [7.9]	-10-001	[01/05/10]
Performance Proof Test – Prudency 9600164-573, Rev 0*	8		[040R1 PPPruRep P.pdf] [2.2]	-10-001	[01/05/10]
Performance Proof Test – Prudency 9600164-573, Rev 0**	8	9	[041R1 PPPruRep NP.pdf] [6.2]	-10-001	[01/05/10]
Radiation Test Report 9600164-533, Rev 2*	8		[042R1 RadRep P.pdf] [1.1]	-10-001	[01/05/10]
Radiation Test Report 9600164-533, Rev 2**	8	9	[043R1 RadRep NP.pdf] [1.3]	-10-001	[01/05/10]
Reliability/Availability Report 9600164-532, Rev 0*	3c		[044 ReliabilityRep P.pdf] [6.4]	(-004) -007	[11/17/09]
Reliability/Availability Report 9600164-532, Rev 0**	3c	4c	[045 ReliabilityRep NP.pdf] [19.3]	(-004) -007	[11/17/09]
Failure Modes and Effects Analysis 9600164-531, Rev 1*	28		[046R1 FMEAREP P.pdf] [0.9]	-12-003	[02/10/12]
Failure Modes and Effects Analysis 9600164-531, Rev 1**	28	29	[047R1 FMEAREP NP.pdf] [0.6]	-12-003	[02/10/12]
Maximum Response Time Calculation 9600164-731, Rev 0*	3c		[048 MaxRespTime P.pdf] [1.1]	(-004) -007	[11/17/09]
Master Test Plan 9600164-500, Rev 5*	8		[049R1 MTP P.pdf] [4.7]	-10-001	[01/05/10]
Master Test Plan 9600164-500, Rev 5**	8	9	[050R1 MTP NP.pdf] [6.7]	-10-001	[01/05/10]
Nuclear Qualification Quality Plan 9600164-002, Rev 3	3c	4c	[051 NQQP.pdf] [1.6]	(-004) -007	[11/17/09]
TUV Type Approval Report and Certificate (V10.2.1)	3c	4c	[052 TUVCert 10 2 1.pdf] [1.0]	(-004) -007	[11/17/09]
Planning & Installation Guide 9700077-012 (Feb 009)		5c	[053 PandlGuide NP.pdf] [5.0]	(-005) -008	[11/18/09]
Users Manual for Field Term. 9700052-018 (Feb 2009)		5c	[054 FTGuide NP.pdf] [9.0]	(-005) -008	[11/18/09]
TRICON Comm. Guide 9700088-008 (Feb 2009)		5c	[055 ComGuide NP.pdf] [2.2]	(-005) -008	[11/18/09]
Developers Guide, TS1131 V4.1 9700100-003 (Aug 2006)		5c	[056 DevGuide NP.pdf] [4.7]	(-005) -008	[11/18/09]
Triconex Training Manual 9750002-001 (Rev 1.2)		5c	[057 TrainMan NP.pdf] [6.7]	(-005) -008	[11/18/09]
TRICON Product Guide, V10.2.1 9791007-013 (Aug 2006)		5c	[058 TechProdGuide NP.pdf] [3.4]	(-005) -008	[11/18/09]
Enclosure 1: - Affidavit #TCXNRC-09-03	6	7	[059 Affidavit3.pdf] [3.0]	-006	[11/13/09]
Supplemental Test Plan 9600164-800 Rev 0*	6		[060 SupTest 4 16 P.pdf] [0.8]	-006	[11/13/09]
Supplemental Test Plan 9600164-800 Rev 0**	6	7	[061 SupTest 4 16 NP.pdf] [0.7]	-006	[11/13/09]
Master Configuration List 9600164-540 Rev 22*	8		[062R1 MCL P.pdf] [1.0]	-10-001	[01/05/10]
Master Configuration List 9600164-540 Rev 22**	8	9	[063R1 MCL NP.pdf] [2.3]	-10-001	[01/05/10]
Software Quality Assurance Plan 9600164-537 Rev 0	6	7	[064 SQAP.pdf] [1.1]	-006	[11/13/09]
System Description 9600164-541, Rev 0*	6		[065 SysDesc P.pdf] [2.2]	-006	[11/13/09]
System Description 9600164-541, Rev 0**	6	7	[066 SysDesc NP.pdf] [3.1]	-006	[11/13/09]
EFT Test Procedure 9600164-514, Rev 0*	8		[067R1 EFTTestPro P.pdf] [1.7]	-10-001	[01/05/10]
ESD Test Procedure 9600164-512, Rev 1*	6		[068 ESDTestPro P.pdf] [1.7]	-006	[11/13/09]
Radiation Exposure Test Procedure 9600164-511, Rev 0*	6		[069 RadExpTestPro P.pdf] [1.5]	-006	[11/13/09]
Seven Day Elevated DC Voltage Report 9600164-557, Rev 0	6	7	[070 7DayDCTestRep.pdf] [3.6]	-006	[11/13/09]
TSAP Software V&V Plan 9600164-513, Rev2*	6		[071 TSAP SVVP P.pdf] [2.3]	-006	[11/13/09]
TSAP Software V&V Plan 9600164-513, Rev2**	6	7	[072 TSAP SVVP NP.pdf] [1.5]	-006	[11/13/09]
TSAP V&V Report 9600164-536, Rev 0	6	7	[073 TSAP V&VRep.pdf] [1.1]	-006	[11/13/09]
Independent Tricon V10 Equipment Qualification Assessment	6	7	[074 IndAssess.pdf] [0.2]	-006	[11/13/09]

<i>Document Description</i>	<i>Prop CD*</i>	<i>Public CD</i>	<i>[filename] [size MB]</i>	<i>Trans Letter (s)</i>	<i>Date sent, final</i>
Triconex QA Manual	6	7	[075 QAM.pdf] [1.2]	-006	[11/13/09]
Analog I/O Machine Count Calc 9600164-730, Rev 0*	6		[076 AIO Calc P.pdf] [1.1]	-006	[11/13/09]
ETP Interface Cable Similarity Analysis 9600164-538, Rev 0*	6		[077 CableSimAnalysis P.pdf] [1.0]	-006	[11/13/09]
Change Impact Analysis 9600164-542, Rev 0*	6		[078 ChangeImpactAnalysis P.pdf] [1.9]	-006	[11/13/09]
Enclosure 1: - Affidavit #TCXNRC-09-04	8	9	[079 Affidavit4.pdf] [3.0]	-10-001	[01/05/10]
MDM 12.1, Production Order Tag Report*	10		[080 MDM 12 1 P.pdf] [0.5]	-10-003	[04/06/10]
QPM 2.1, Quality Planning*	10		[081 QPM 2 1 P.pdf] [0.5]	-10-003	[04/06/10]
QPM 13.2, Product Discrepancies*	10		[082 QPM 13 2 P.pdf] [0.5]	-10-003	[04/06/10]
EDM 11.03, Process and Product Quality Assurance*	10		[083 EDM 11 03 P.pdf] [0.5]	-10-003	[04/06/10]
EDM 12.00, Product Development Process*	10		[084 EDM 12 00 P.pdf] [0.7]	-10-003	[04/06/10]
EDM 12.10, Project Planning*	10		[085 EDM 12 10 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 12.50, Requirements Management*	10		[086 EDM 12 50 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 20.00, Configuration Management*	10		[087 EDM 20 00 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 21.30, Change Impact Analysis*	10		[088 EDM 21 30 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 24.00, Software Configuration and Change Control*	10		[089 EDM 24 00 P.pdf] [0.5]	-10-003	[04/06/10]
EDM 74.00, Nuclear Qualification of Triconex Products*	10		[090 EDM 74 00 P.pdf] [0.7]	-10-003	[04/06/10]
EDM 76.00, Dedication of Products for Nuclear Service*	10		[091 EDM 76 00 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 90.00, Product Verification*	10		[092 EDM 90 00 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 90.10, Product Validation (New since V9 SER)*	10		[093 EDM 90 10 P.pdf] [0.6]	-10-003	[04/06/10]
EDM 90.30, Control of Tools and Test Software*	10		[094 EDM 90 30 P.pdf] [0.6]	-10-003	[04/06/10]
9100055-001, Nuclear Dedicated Parts List*	10		[095 NDPL P.pdf] [0.8]	-10-003	[04/06/10]
9100055-103, DPE-03*	10		[096 DPE03 P.pdf] [0.8]	-10-003	[04/06/10]
9100055-105, DPE-05*	10		[097 DPE05 P.pdf] [0.4]	-10-003	[04/06/10]
9600164-534, System Accuracy Specifications, Rev 3	28	29	[098R1 SysAccSpec.pdf] [0.2]	-12-003	[02/10/12]
9100112-001, Safety Concepts*	10		[099 SafetyConcepts P.pdf] [1.9]	-10-003	[04/06/10]
9100042-002, NGIO System Architecture Specification*	10		[100 NGIOSysArch P.pdf] [1.4]	-10-003	[04/06/10]
6200152-002, TCM System Architecture Specification*	10		[101 TCMSysArch P.pdf] [1.0]	-10-003	[04/06/10]
6200106-001, ETSX Software Architecture Specification*	10		[102 ETSXArch P.pdf] [1.0]	-10-003	[04/06/10]
9100113-001, Safety Requirements*	10		[103 SafetyReqmts P.pdf] [0.6]	-10-003	[04/06/10]
7100222-001, Tricon Main Processor Hardware Design Spec*	10		[104 MPHWDDesSpec P.pdf] [3.9]	-10-003	[04/06/10]
9100042-001, NGIO System Requirements Specification*	10		[105 NGIOSysReq P.pdf] [0.7]	-10-003	[04/06/10]
6200152-001, TCM System Requirements Specification*	10		[106 TCMSysReq P.pdf] [0.8]	-10-003	[04/06/10]
6200156-001, NGIO Core Software Architecture and Des Spec*	10		[107 NGIOCoreArch P.pdf] [1.0]	-10-003	[04/06/10]
6200152-004, TCOM Software Design Specification*	10		[108 TCOMSWDes P.pdf] [1.9]	-10-003	[04/06/10]
9100046-001, NGIO EPP, Engineering Project Plan*	10		[109 NGIOEPP P.pdf] [0.7]	-10-003	[04/06/10]
6200155-001, NGIO Core Software Reqmts Specification*	10		[110 NGIOCoreSRS P.pdf] [0.9]	-10-003	[04/06/10]
6200152-003, TCOM Software Requirements Specification*	10		[111 TCOMSRS P.pdf] [0.7]	-10-003	[04/06/10]
6200033-001, TriStation 1131 Software Requirements Spec*	10		[112 TS1131SRS1 P.pdf] [1.0]	-10-003	[04/06/10]
6200033-002, TriStation 1131 V4.1 Software Reqmts Spec*	10		[113 TS1131SRS2 P.pdf] [0.4]	-10-003	[04/06/10]
9100098-001, NGIO Core H/W Requirements Specification*	10		[114 NGIOCoreHRS P.pdf] [0.6]	-10-003	[04/06/10]
9100098-002, NGIO Core H/W Design Specification*	10		[115 NGIOCoreHDS P.pdf] [0.9]	-10-003	[04/06/10]

<i>Document Description</i>	<i>Prop CD*</i>	<i>Public CD</i>	<i>[filename] [size MB]</i>	<i>Trans Letter (s)</i>	<i>Date sent, final</i>
6200159-001, NGIO Core Software Test Plan*	10		[116 NGIOCoreSTP P.pdf] [0.5]	-10-003	[04/06/10]
6500155-000, TCM Software Test Plan*	10		[117 TCMSTP P.pdf] [0.5]	-10-003	[04/06/10]
TCM A Traceability Report.doc*	10		[118 TCMATrace P.pdf] [0.9]	-10-003	[04/06/10]
Traceability Matrix NGIO CORE SYRS to NGIORVP.doc*	10		[119 NGIOCoreTrace P.pdf] [0.6]	-10-003	[04/06/10]
Traceability Matrix NGAI SYRS to NGAIRVP.doc*	10		[120 NGAISysTrace P.pdf] [0.5]	-10-003	[04/06/10]
Traceability Matrix NGDO SYRS to NGDORVP.doc*	10		[121 NGDOSysTrace P.pdf] [0.5]	-10-003	[04/06/10]
9600127-004, System Test Procedure*	10		[122 SysTestProc004 P.pdf] [9.2]	-10-003	[04/06/10]
9600158-002, Tricon V10.1 Sys Functional Validation Proc*	10		[123 10_1SysValProc P.pdf] [0.9]	-10-003	[04/06/10]
9600038-001, Tricon V9+ I/O Modules Functional Val Proc*	10		[124 V9_IOValProc P.pdf] [1.1]	-10-003	[04/06/10]
6500106-003, Enh Tricon Sys Executive Software Test Descr*	10		[125 SysExecSTD P.pdf] [12.5]	-10-003	[04/06/10]
6200157-001, NGIO Core Software Test Description*	10		[126 NGIOSTD P.pdf] [0.8]	-10-003	[04/06/10]
6500155-011, TCM TSAA Software Test Description*	10		[127 TCM TSAASTD P.pdf] [0.8]	-10-003	[04/06/10]
V&V Final Report Tricon V10.2 and V10.2.1*	10		[128 V&VRep 10 2 1 P.pdf] [8.9]	-10-003	[04/06/10]
SQA Validation Summary Report Tricon I/O 451-515, V9.X *	10		[129 SQAValSummaryRep P.pdf] [9.7]	-10-003	[04/06/10]
Tricon V10.1 Validation Report*	10		[130 ValRep 10 1 P.pdf] [1.1]	-10-003	[04/06/10]
6200003-195, Tricon V10.2 Release - Software Release Def*	10		[131 SRD 10 2 P.pdf] [0.7]	-10-003	[04/06/10]
6200003-196, Tricon V10.2.1 Release - Software Release Def*	10		[132 SRD 10 2 1 P.pdf] [0.6]	-10-003	[04/06/10]
Dedication Package Example – 022210*	10		[133 DedicationPkg P.pdf] [1.1]	-10-003	[04/06/10]
Enclosure 1: - Affidavit #TCXNRC-10-01	10	11	[134 Affidavit10 1.pdf] [0.3]	-10-003	[04/06/10]
Topical Report 7286-545-1, Rev 4	20	21	[135R2 TR Rev4.pdf] [1.1]	-11-001	[01/05/11]
Topical Report 7286-545-1, Rev 4, Appendix A, Comp Matrix	20	21	[136R2 TR Rev4 AppA.pdf] [0.8]	-11-001	[01/05/11]
Topical Report 7286-545-1, Rev 4, Appendix B, App Guide	20	21	[137R2 TR Rev4 AppB.pdf] [0.7]	-11-001	[01/05/11]
Enclosure 1: - Affidavit #TCXNRC-10-02	12	13	[138 Affidavit10 2.pdf] [0.2]	-10-004	[04/09/10]
Triconex Development Processes for Programmable Logic Devices in Nuclear-Qualified Products – NTX-SER-09-06, Rev 1*	18		[139R1_PLDDDev_P.pdf] [3.0]	-10-007	[08/05/10]
Enclosure 1: - Affidavit #TCXNRC-10-03	14	15	[140 Affidavit10 3.pdf] [0.2]	-10-005	[04/23/10]
Compliance with NRC Interim Guidance ISG-2 and ISG-4 – NTX-SER-09-010, Rev 3*	26		[141R2_ISG24Rev3_P.pdf] [1.6]	-12-002	[02/07/12]
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