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General Comment

On page 4 (first full paragraph), the discussion of the main changes in IEEE 1028 should compare the 2008 version with the 1997 version.

The discussion in C.7 (V&V Tasks) needs to be expanded to reconcile the differences between the separate endorsement of IEEE Std 829-2008 Annex C in DG-1207 to ensure consistency for the treatment of test-related tasks. The DG-1267 approach when coupled with DG-1267 would require the use of two task schemes for the test-related tasks.

DG-1207 Regulatory Position C.6 states:

The NRC staff takes exception to the Table B.3, "Risk assessment scheme" in Annex B. The IEEE Std. 829-2008 statement about the Table B.3 illustration for determining the likelihood and evaluating software integrity level lower than Level 4 is not acceptable. The likelihood of occurrence is likely to cause catastrophic consequence and thus the breadth or depth of testing and documentation should adhere to the proper activities for a nuclear software safety system product. The licensee or applicant should assign integrity level 4 or the equivalent to software used in nuclear power plant safety systems, as demonstrated by a mapping between its approach and integrity level 4 and defined in IEEE Std. 829-2008.

DG-1267 Regulatory Position C.8 states:

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Annex B (of IEEE 1012-2004), "A Risk-based Software Integrity Level Scheme," describes the four software integrity levels and associated consequences. This regulatory guide endorses this annex, as described in Staff Regulatory Guidance position 1.

The NRC positions in the two DGs are contradictory, since the Annex B information in IEEE Std 829-2008 and IEEE Std 1012-2004 are essentially equivalent. The contradictory NRC positions should be reconciled.