MIT Research Reactor

Edward S. Lau Assistant Director of Reactor Operations MIT Nuclear Reactor Laboratory

MIT Reactor Protection System using DWK250 Channels and PLC Logic Circuit

Phase 0 Review Public Meeting with NRC October 12, 2012

Discussion Topics

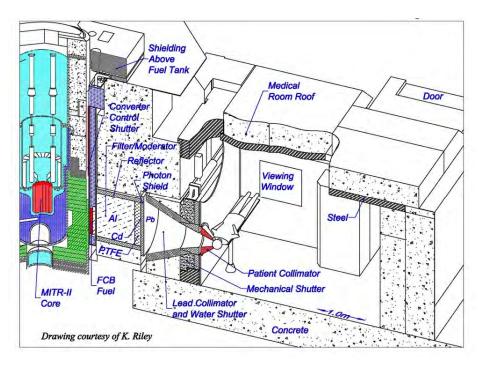
- Overview of MIT Research Reactor
- Existing MITR Nuclear Instrumentation & Control
- Upgrading to Digital Nuclear Instrumentation
- Description of DWK250 Channel
- Status Update on Use of PLC Logic Circuit
- Schedule for License Amendment Request
- Documentation & License Amendment Content
- Questions & Comments

Overview of MIT Research Reactor (i)



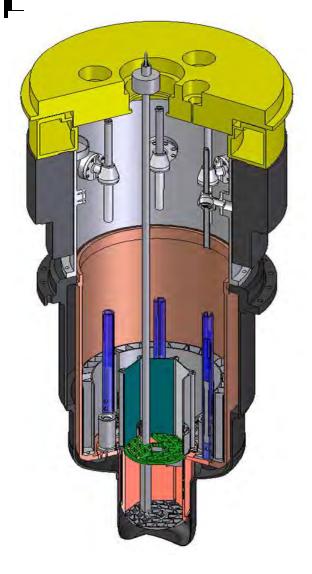
- Constructed in 1958
- Upgraded in 1975
- Capable of operating 24/7 at up to 6 MW thermal power, ~65% capacity factor
- Tank-type, light water to cool and moderate
- Two-loop cooling system, modern cooling tower
- Uses heavy water D₂O for neutron reflection
- Graphite outer reflector

Overview of MIT Research Reactor (ii)



- U-235 fuel
- Primary loop circulates at ~2000 gpm
- Secondary loop circulates at ~1800 gpm
- Six shim blades and one regulating rod
- Safety channels: three on power level, three on reactor period
- Three more channels, displaying megawatts

MIT Reactor In-Core Experiment Capability



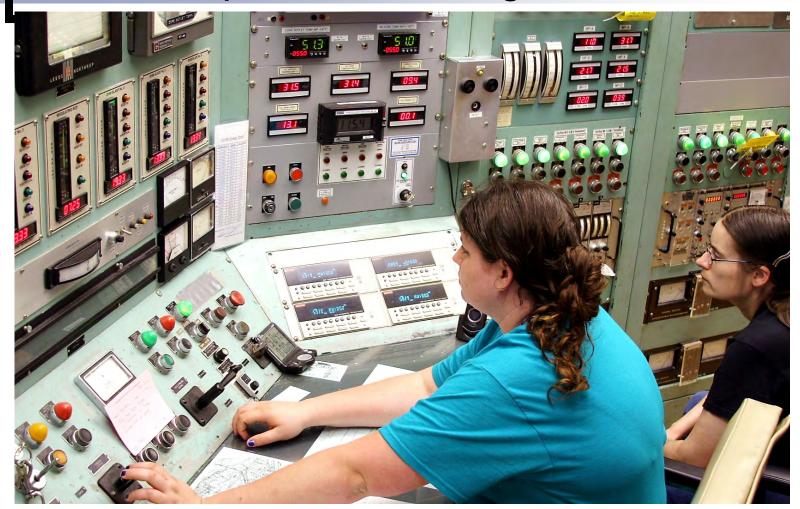
- Capable of performing up to three in-core experiments simultaneously for the highest neutron fluxes
- In-core thermal neutron flux is 3x10¹³ #/cm²-s, and fast flux is 1x10¹⁴ #/cm²-s; similar to full-size commercial light-water power reactors
- U.S. NRC authorized in-core fuel irradiations of up to 100 grams of fissile material
- Advanced materials and fuel research

MIT Reactor Experiment Capability



- In-Core Sample Irradiation Facility (ICSA) provides fast neutron flux of up to 1x10¹⁴ #/cm²-s
- Other facilities provide thermal flux up to 5x10¹³ #/cm²-s for NAA and isotope activation

Reactor Operator Training



Phase 0 Public Meeting

Primary Heat Exchanger & Major Coolant Piping – New in 2010



Phase 0 Public Meeting

Existing MITR Nuclear I&C – since 1975



- Channels #1 through #6
- Ch. #1 3 for short reactor period scram
- Ch. #4 6 for high reactor power scram
- Ch. #1 3 Keithley model 26000 meters measure period
- Ch. #1 & #2 operate on fission chambers for source range <u>or</u> on ion chambers for power range
- Ch. #5 & #6 can switch to low-range amplifiers for <100 kW operation

Existing MITR Nuclear I&C – since 1975



- Custom built by MIT-NRL
- Analog components subject to aging
- No more spare parts
- Fixing one part breaks two more
- 120-volt operation
- Set-points drift, particularly with ambient temperature and component heat-up over time
- Channel calibrations and scram checks only with the reactor shut down

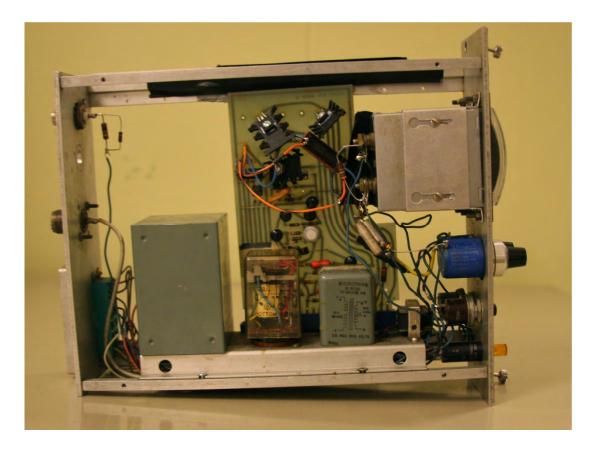
Analog Nuclear Instrumentation Channel



- Fully analog safety amplifier for each channel
- Curved meter faces
- Non-adjustable zeroes
- Scram test signal doesn't follow the path of the input signal from the detector
- Meter response imperceptible for high-range amplifiers at low power
- Can't tell if your detector is unplugged!

Phase 0 Public Meeting

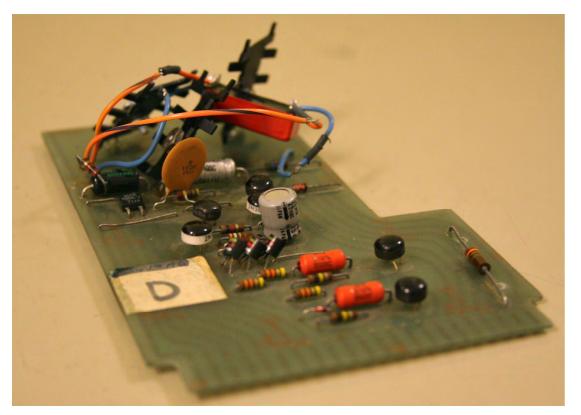
Analog Nuclear Instrumentation Channel



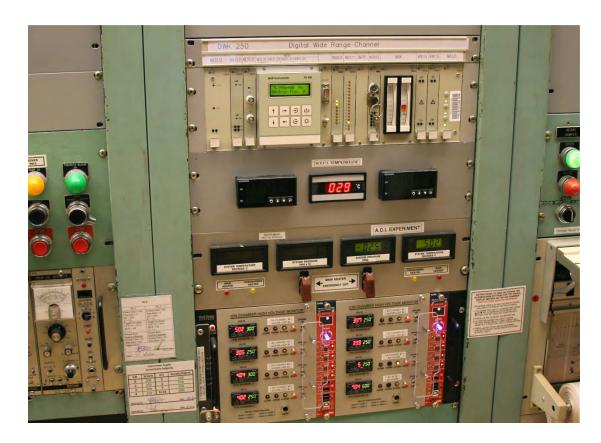
- Ch. #5 & #6 amplifier NIM bins (rear pin receptors) began to fail frequently from repeated connection and disconnection
- Ch. #5 & #6 require circuit board switching between low-range amplifier and full power amplifier; this accelerated failure of the circuit board
- Circuit connection strips on installation-edge of board physically wearing out
- Circuit paths fading

Phase 0 Public Meeting

Analog Nuclear Instrumentation Channel



- Circuit board layout is different for every amplifier, to compensate for different detector characteristics
- Components and wiring susceptible to noise interference, resulting in frequent spurious trips
- Solder joint corrosion
- Large heat sinks are a must for heat-producing transistors; active local fan cooling was also required, which added vibration



- Each channel provides short reactor period scram & high reactor power scram
- Each channel utilizes one fission chamber for widerange power operation
- Reactor power and period calibration and scram checks can be done with the reactor operating
- Test signal travels along the detector signal path starting from the fission chamber pre-amplifier



- Each DWK 250 monitor incorporates three different microprocessor modules for signal processing
- Each microprocessor executes its function as set by the firmware permanently programmed into its non-volatile memory EPROMs.
- Execution of firmware is confirmed by continual checksum comparison
- Microprocessors and firmware have field-proven reliable for >25 years in European nuclear industry



- The microprocessors handle pulse signals and also perform "Campbelling", allowing wide-range indication
- Trip set-points do not drift
- Detector voltage and internal operating voltages monitored for compliance with adjustable tolerances
- Continuous Op-code handshaking between the DWK's microprocessors as an active check of functionality



Eight binary (relay) outputs

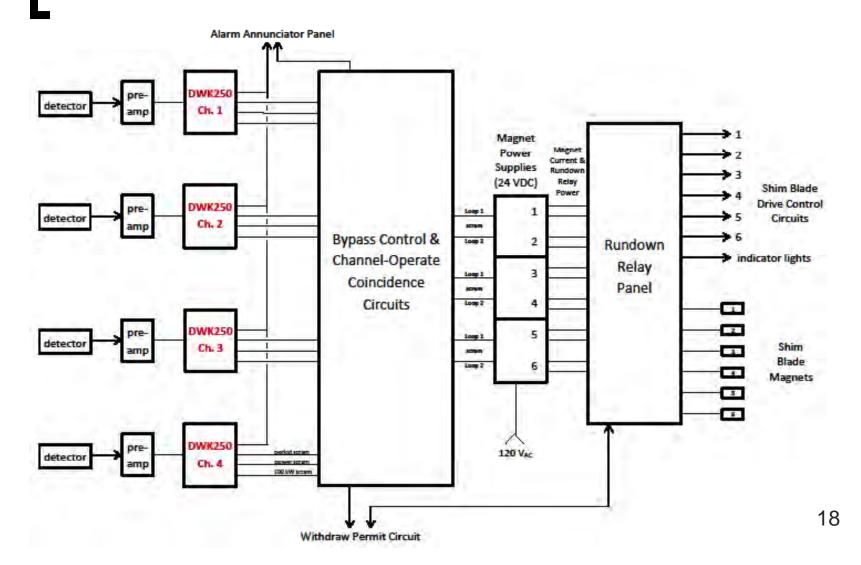
 DWK uses two for internal fault indication; MITR uses two for scram circuit

- Two analog outputs
- One digital output
- MITR will use for display and recording

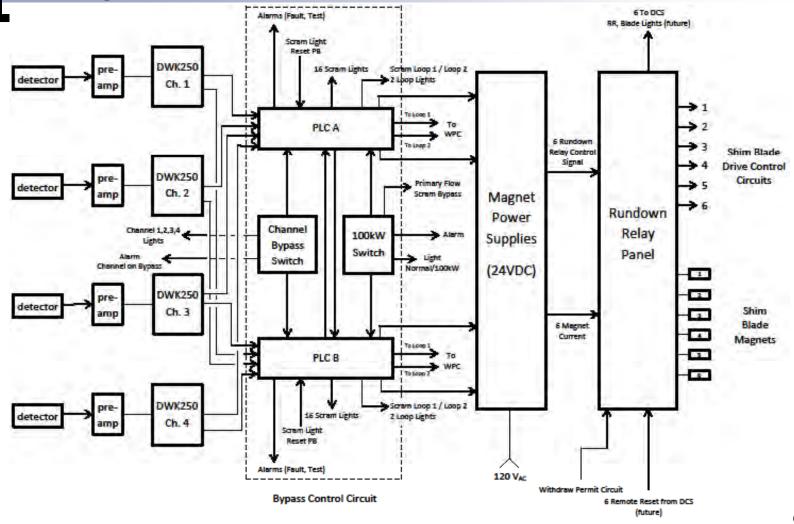


Phase 0 Public Meeting

MIT Reactor Protection System



MIT Reactor Protection System using PLCs in the Coincidence Circuit



Block Diagram of MIT Reactor Protection System (Dual-PLC Concept)

DWK 250 Quality Standards

- DWKs, their firmware and their pre-amps designed and manufactured in Germany
- Qualified by TUV per German nuclear regulatory KTA guidelines 3501, 3502, 3505, 3507, and 1401
- Compliance with international standard IEC 61226 for safety equipment Category A
- Equivalent to IEEE 323 Classification 1E equipment for nuclear power stations, and to IEEE 344 Classification 1E equipment with regards to seismic qualification

Description of DWK250 Channels

- See separate presentation material from Mirion Technologies:
 - Technical Description
 - Qualification and Certification



DWK 250 Wide Range Neutron Flux Measurement Channel

- I Detector for Start-up/Intermediate/Power Range
- Source Range Pulse Processing
- Campbell (RMS) Processing for Intermediate Range
- Combined pulses/RMS signal provides Wide-range output



MITR DWK 250

Digital Wide Range Channel

(from the ProTKTM family of signal processors)

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Radiation Monitoring Systems Division MITR-NRC 10-17-12 Version Rev.1





APPLICATIONS

- $_{\odot}$ Operational process monitoring
- Measurement & monitoring of neutron flux & the rate of change, spanning start-up, intermediate, and power operation

proTK[™] Signal Processing Neutron Flux Monitoring System

- MAJOR ATTRIBUTES
 - Modular construction
 - ${\rm \circ}$ Versatile applications
 - Robust and reliable
 - Proven by operational experience

The proTK[™] Neutron Flux Monitoring System combines long term experience in design and manufacturing of both detectors and signal processing electronics. These products are strictly oriented to the highest level of safety relevance and reliability which are qualified by several type tests and proven by excellent operational experience. The proTK[™] covers requirements for measuring equipment used for the reactor protection system according to IEC 61226 cat A.

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proTK[™] Signal Processing Neutron Flux Monitoring System

Digital Neutron Flux Channels

DAK 250	Source range and intermediate range monitoring With pulse processing or DC signal processing, reactimeter optional also used e.g. for steam generator leakage monitoring (N16)
For MITR: DWK 250	Wide range monitoring With combined pulse processing and Campbell signal processing using in-core& ex-core fission chambers
DGK 250	Power range monitoring For the PWR with 1 or 2 signal paths for neutron ionization chambers
DLK 250	Flux distribution monitoring For 3 or 6 SPN detectors with background compensation, calibration and noise reduction
DSK 250/ DMK 250	Local & average power range monitoring For the BWR with average flux and flow related flux, including stability monitoring

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proTK[™] Signal Processing Neutron Flux Monitoring System

Features

- Modular system w/separate microprocessor for the safety signal path
- Cycle time of signal processing starting with 5 ms
- Low heat C-MOS technology
- Software fixed in EPROM, efficient self-monitoring
- Remote signal generators & signal simulation
- Qualified according to KTA 3501/3505, DIN V VDE 0801
- Dedicated analog & binary output signals
- Three analog outputs (linear or logarithmic)
- Up to 16 adjustable alarm set-points
- Remote test generators for testing w/o external equipment
- Digital parameters, lockable & non-volatile
- Full testing & data exchange via serial data interface
- Continuous functional self-checks e.g. program flow
- Certified by TÜV according to KTA 3501/3505 (IEC 61226 Cat. A) *Type-tested*

















proTK[™] Neutron Flux System

- ✓ Flexibility
- ✓ Sensitivity
- ✓ Integrity
- ✓ Quality
- ✓ Reliability

MITR CHANNEL:

WIDE RANGE

DETECTOR:

EX-CORE, AC MODE, WIDE-

RANGE FISSION CHAMBER

SIGNAL PROCESSOR:

DWK 250

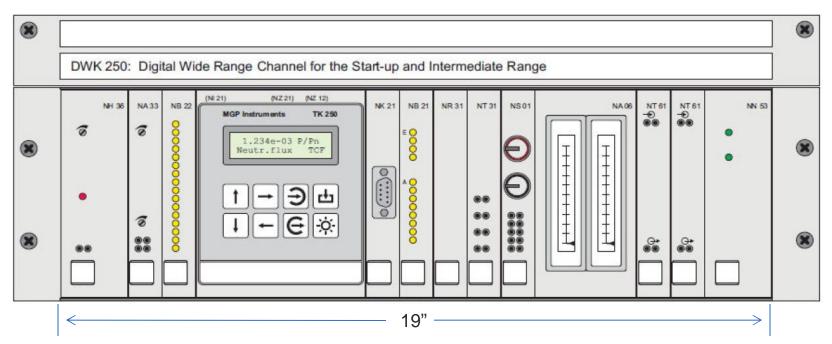
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DWK 250 Digital Wide Range Channel Main Electronic Rack



Processes a combination of pulse and Campbell (RMS) signals from in-core (BWR) or ex-core (PWR & MITR) fission chambers to produce pulse, intermediate, and wide-range neutron flux and reactor period signals.

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Wide Range Preamplifier TKV 23



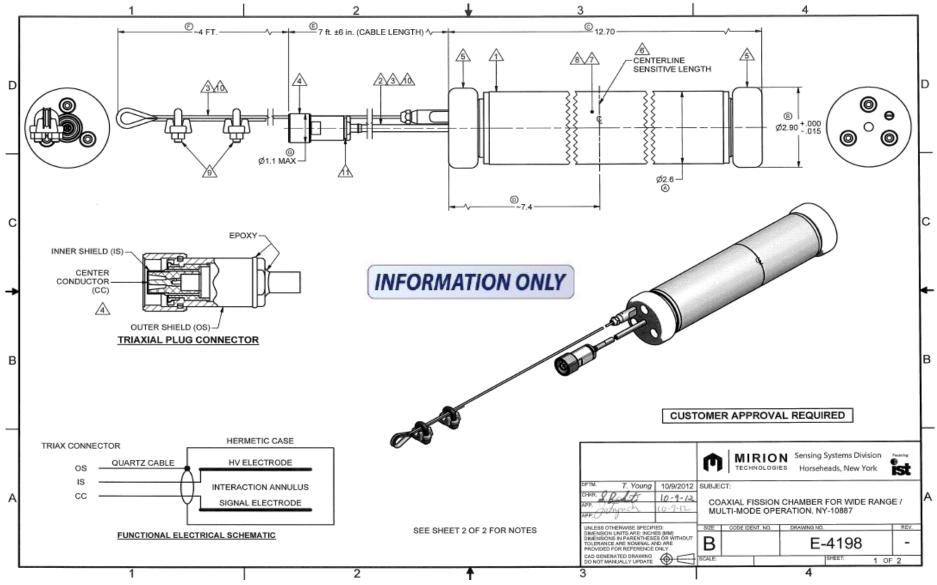
- Preamplifier for fission chambers
- Pulse output for start-up range
- Alternate current output for intermediate & Power range
- Signal for high voltage monitoring
- <u>75Ω</u> line driver for long cable lengths
- Stable HF- proofed brass housing

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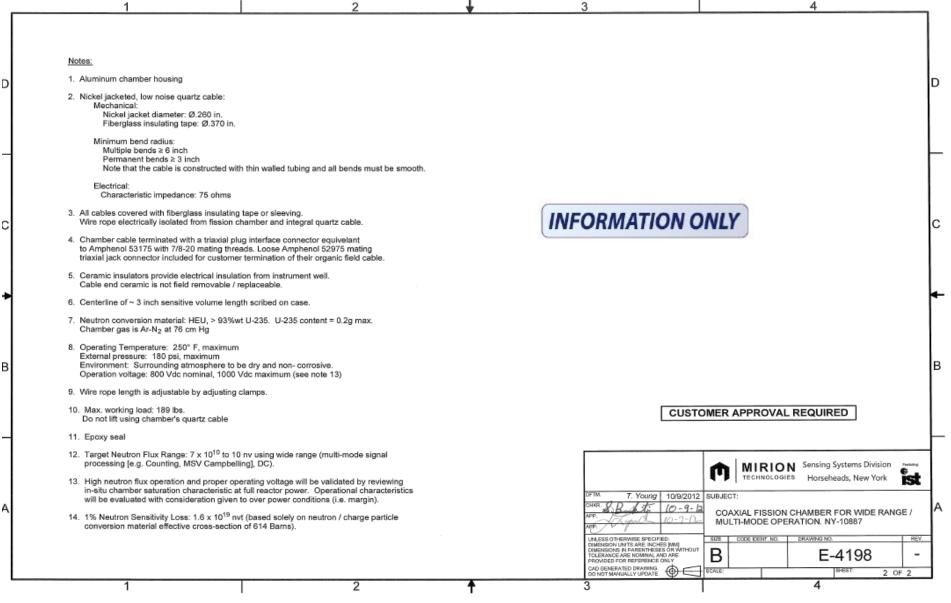


Wide-Range Fission Chamber for DWK 250 - slide 1 of 2





Wide-Range Fission Chamber for DWK 250 - slide 2 of 2





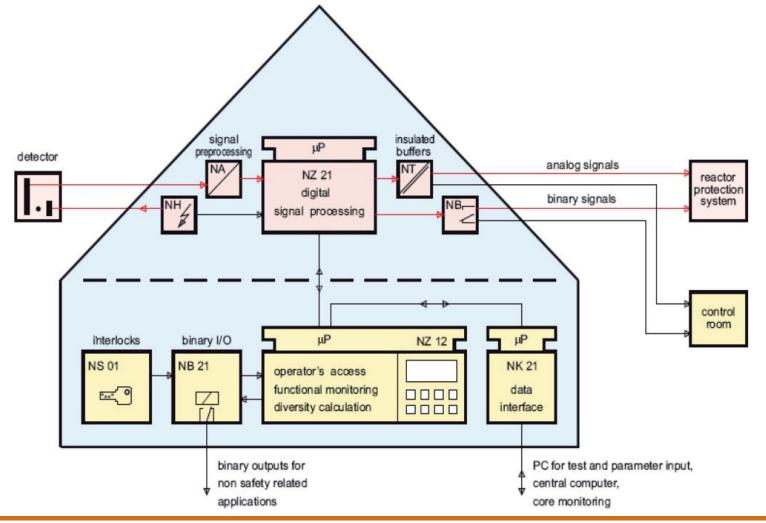
Signal Processing

- Digital neutron flux monitoring channel DWK 250 is characterized by:
 - Efficient functions
 - Useful procedures for periodic testing
 - Comfortable operators menu structure
 - Rugged operational behavior
 - Hardware & software are arranged in modules
 - Internal multiprocessor structure offers the flexibility of reducing the region of highest safety relevance to a small, separated part within the channel





Architecture



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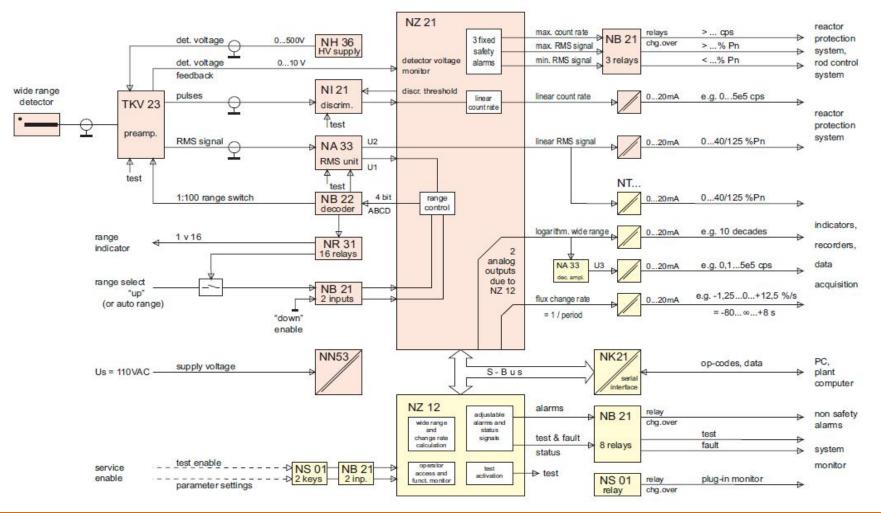
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DWK 250 Functional Diagram



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MIRION TECHNOLOGIES

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Clear & Simple Design

- The functions for the safety signal path are concentrated on the independent I/O-micro-processor board NZ 21:
 - $_{\odot}\,$ The software is purely sequential and deterministic
 - $_{\odot}\,$ The software operates cyclic in a fixed time grid, e.g. 5 ms
 - $_{\odot}\,$ Therefore, the response time is predictable
 - $_{\rm O}\,$ There is no operating system
 - \circ The volume of the software is as small as 3 kByte
 - All other functions e.g. operator's access are allocated on the "main processor board" NZ 12 and both processor boards (NZ 12 and NZ 21) perform self monitoring functions.
- Re-use of type-tested and proven software modules
- The target: zero-fault software
 - $\circ\,$ Designed and developed by well-trained engineers
 - Verified and Validated via type test by independent experts (TÜV)
 - Field-proven by long-term operational experience

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Software Credibility

- Measures against CCF of the software
 - Additional to the simple and clear design there is:
 - No use of interrupts on NZ 21, only 1 interrupt on NZ 12
 - No use of real time clock or calendar
 - NZ 12 has no direct access to NZ 21 and its
 - ✓ Program sequence
 - ✓ Data or parameter memory
 - The access to DWK 250 parameters & test-procedures is hardware locked by key switches
 - A variety of self monitoring devices, some of them complementary between NZ 12 and NZ 21

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Self-checks & Tests

- Different tools make periodic testing efficient and easy:
 - Test generators in both the pre-amps and input-boards of the channel:
 - ✓ Activated remotely without manipulation in the wiring
 - ✓ Insert a reference signal to the input of the electronic channel
 - The tool "simulation" enables users to:
 - ✓ Insert arbitrary numbers at defined points of the signal path
 - ✓ Generate all desired output values for analog signals or alarms
 - In test mode, binary outputs (relays) may be activated or deactivated
 - All testing tools are locked by key-switch and generate a flag signal
 - The basic procedure for periodic testing
 - \checkmark Is described in the user manual
- A variety of items is used to detect faults of hardware and software, e.g. monitoring of internal voltage, arithmetic, time schedule, micro-processors, transfer of data, and program memory.
- Additionally the NZ 12 is monitored by a watch dog.

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Operator Access

- The access to parameters and testing is locked by 2 key switches
 - Without key: parameters may be displayed, but not modified
- A parameter protocol may be generated on a PC via serial interface using purely read-only instructions
- The variety of functions and parameters is limited by "configuration" according to customer/project requirements:
 - Delete (enable and hide) unused functions
 - Establish "fixed parameters", e.g. scalings or trip thresholds
 - Use of modified text tables, e.g. language version
 - Configuration is done by Mirion Technologies
 - Configuration data are stored in EPROM





Type Testing

- The type test of hardware was performed according to KTA 3505
 - Theoretical and practical tests observed and checked by TÜV
 - Test results transferable to IEEE 323 and IEC 60780
 - Operational history data for all boards available
- Software type test also was performed by independent experts:
 - o DPK 251 and DSK 250 by ISEB-TÜV-Rheinland/Köln
 - o DWK, DAK, DGK, & DLK 250 by TÜV-Nord/Hamburg
 - Both institutes used different testing strategies and tools
 - The type test of the DWK 250 was based on KTA 3501, KTA 3505 and DIN V VDE 0801
- Finally an integration test of hardware and software was performed:
 - $\circ~$ e.g. functions, characteristics, dynamic response, EMC
 - Some tests also under worst-case conditions





DWK 250 Neutron Flux Measuring Channel Features

- Single detector for start-up, intermediate & power ranges
- 10-12 decade measuring range w/up to 16 adjustable alarm set-points
- Both pulse & RMS-Campbell signal processing
- Wide range combining pulses & RMS signal
- Wide range signal calibration to neutron flux or power units (nv, P/Pn)
- Flux change rate calc. (1/reactor period)
- Signal filtering w/variable time constant
- Replaces traditional pulse & intermediate range channels
- Smaller "footprint" & isn't "power hungry"!
- Precise, Stable & Reliable
- Hardware & Software qualified Category A (IEC 61226)

20+ years of successful operation in nuclear power plants and research reactors

pulse & RMS-signal performed by a digital algorithm

Variety of self-checks provides highly reliable remote test generators and signal simulation for periodic testing.

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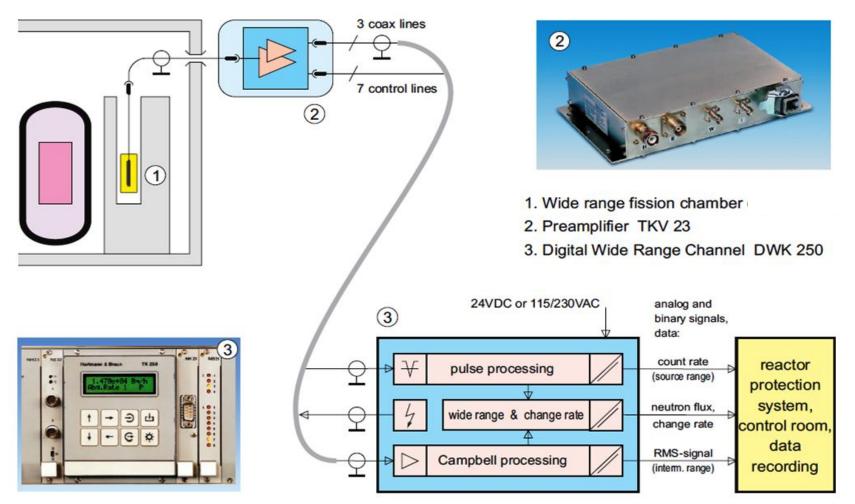
DWK 250 Features (cont.)

- Two analog outputs (linear or logarithmic), 8 binary outputs, defined by MIT
- Dedicated analog & binary output signals
- Remote test generators, also in preamplifier allows periodic testing w/o external equipment
- Digital adjustable parameters, lockable & non-volatile
- Full operation(e.g. testing)& data exchange via serial interface
- Continuous functional self checks





DWK 250 Wide Range Neutron Flux Monitoring



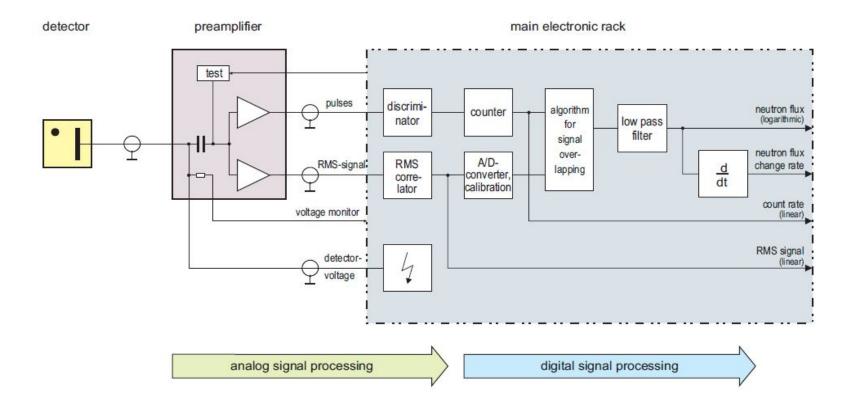
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DWK 250 Signal Paths



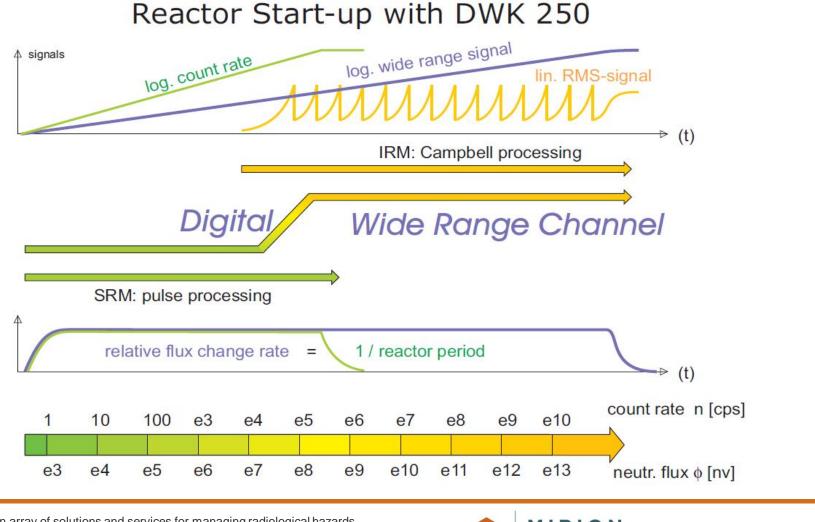
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Start-Up



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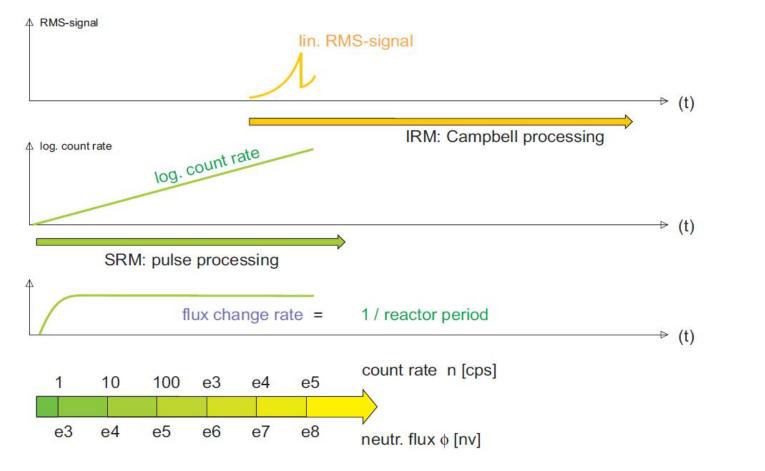
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Pulse Range

Reactor Start-up: pulse range



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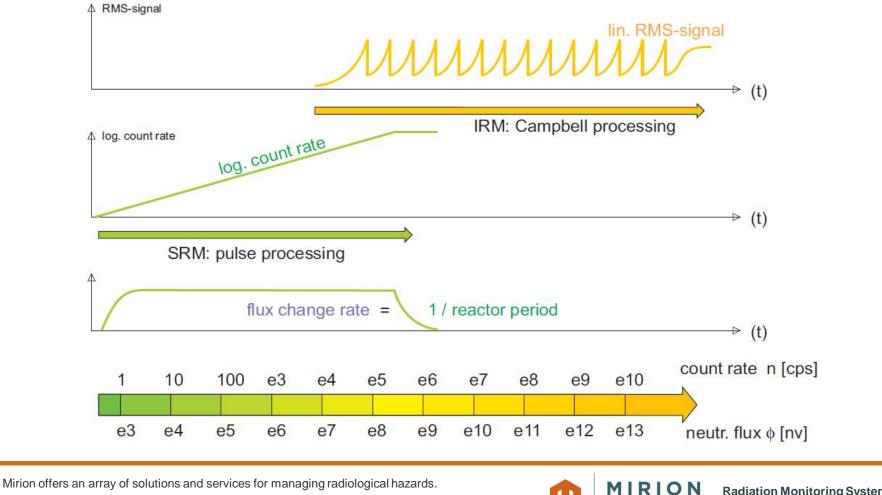
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Intermediate Range

Reactor Start-up: intermediate range



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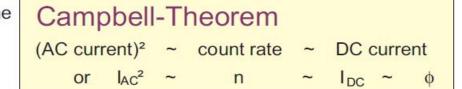
Campbell Signal Processing

What is Campbell signal processing?

applied in the DWK 250 in the intermediate range

- background: a very high number of detector pulses
 - no more can be counted individually
 - will be integrated to a fluctuating current (DC + AC)
- RMS-processing of the AC part (= fluctuation) of the detector current

uses the





- same detector as for the pulse range
 (fission chamber: robust long life 1.C)
 - (fission chamber: robust, long life, LOCA proof)
- no influence of insulation current (I_{insul} is pure DC !)
- very good γ-discrimination (square of n / γ charge ratio)

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Signal Processing

DWK 250 signal processing

Pulse range: processing of detector pulses

- pulse-discriminator with frequency pre-scaler 1:16
- pulse counter is part of the microprocessor
- analog & binary outputs: linear count rate and alarms for the RPS

Intermediate range: RMS-processing

- fully analog signal processing
- linear output signal for the RPS, 16 ranges (= 8 decades)

Wide range: "wide range signal" generated by numerical overlapping of pulse signal and RMS-signal:

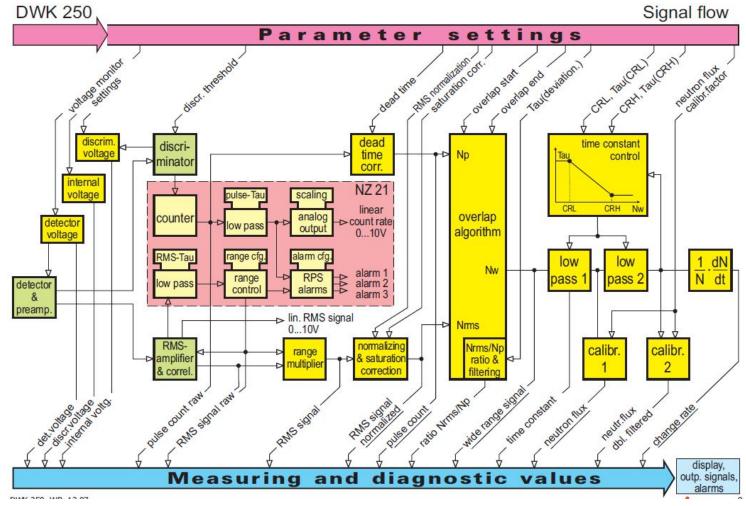
- · smooth overlapping in a defined range to avoid transients
- wide range neutron flux output signal, e.g. 10 decades logarithmic
- continuous calculation of the flux change rate (= 1 / reactor period)
- remote test signals for both signal paths

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DWK 250 Flow Diagram



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DWK 250 Software Menu

Menu Table				DWK 250
Meas.values	Status	Parameters	Testing	Diagn.values
* Neutron flux 1,234e+12 nv Change rate +12,34e-2 1/s Pulse count 1,234e+05 cps RMS signal 1,234e+12 cps Wide range sign. 1,234e+12 cps * default position	Alarms: Which alarm has triggered? Faults: CPU NZ21 arithm.NZ21 overflow RAM NZ21/NZ12 EPROM NZ21/NZ12 PAR_RAM NZ12 S-Bus detector voltage internal voltages discrim. voltage testing locked Software-Ident.: DWK 250 3100 347A K001	General settings: Time constants: Voltage monitor: Alarm settings: Analog outputs: Select dimensions: Plant code: Default param.s:	Binary outputs: BO # 18 -> 0/I Test generators: preamp. off/pulse/RMS discriminator off/F1/F2 RMS-input off/on Simulation: pulse count RMS-signal norm. analog output 1/2 Global test status: normal / test Display: all pixels active Watchdog: be aware: causes a restart of the system!	N.flux doubl. filtered pulse count raw RMS signal raw RMS signal ratio Nrms/Np time constant detector voltage internal voltage discrim. voltage checksum NZ21 checksum NZ12 BI-status NZ21/12 alarm-status NZ21

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(MGPI H&B) GmbH, Munich QUALITY ASSURANCE POLICY



Radiation Monitoring Systems Division Mirion Technologies (MGPI H&B) GmbH, Munich

Quality Assurance Policy

Christine Renn

2012-10-02

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Radiation Monitoring Systems Division

17.10.2012



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- 3. Quality Assurance Certificates
- 4. Certificate of competence for NRC 10 CFR 50 App. B and Part 21
- 5. Software Quality Assurance (IEEE 730; IEC 60880)
- 6. Document reviewing at Mirion (MGPI H&B) GmbH
- 7. Handling, storage and shipping
- 8. Process of Commercial Grade Items
- 9. Export Management and Compliance Program

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QA Policy in the Quality Manual demonstrates the process-oriented management system of MGPI H&B

Quality Manual

gives an general overview of the structure and processes of Mirion Technologies (MGPI H&B) GmbH

Process Descriptions

includes company processes and the determination of areas responsibility; the processes can be divided into four different groups

- 1. Business Processes
- 2. Supporting Processes
- 3. Management Processes
- 4. Quality Assurance Processes



Process Descriptions

Procedures, Operational Instructions, Organizational Instructions, Forms, etc.

Structure of the documentation of the QA-System

Procedures, Operational Instructions.....

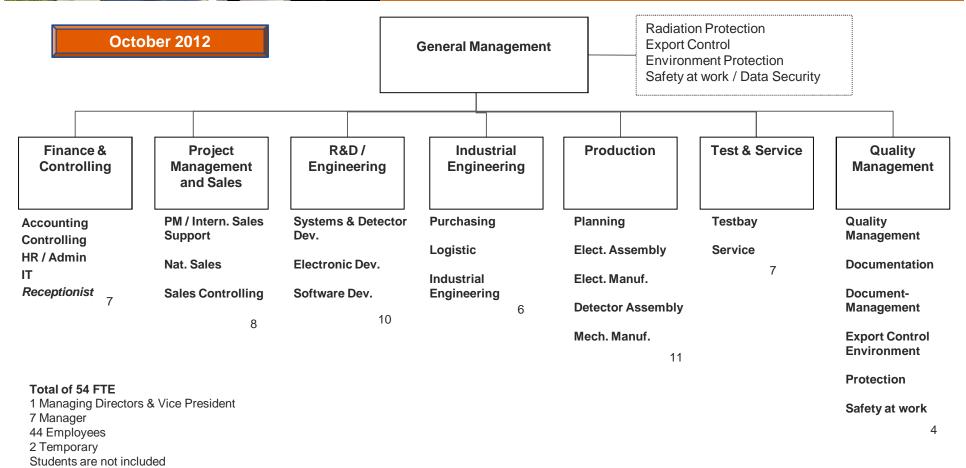
contains regulations on particulars as well as detailed instructions relating to the job functions

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Quality achievements are verified by those who are not responsible for performing the work



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Quality Assurance System according to NRC 10 CFR part 50B and part 21 is audited and certified by Tractebel, Belgium

	_
CERTIFICATE OF AUTHORIZATION nr. 2648	
This is to certify that Mirion Technologies GmbH Kernstrahlungsmesstechnik, in München, Germany	
is hereby authorized ¹ to act as Manufacturer and repair organization, in accordance with the applicable rules of	
10 CFR50 Appendix B	
This authorization is granted on the basis of the Qualitätsmanagement-Handbuch (QMH) reference 0348 250, which scope and implementation have been reviewed and accepted by Tractebel Engineering on April 9 th , 2010 (see audit report n°. 10/016 - CNT-KCD/4FR/15833/000/00)	34.xx-35.xx
for the design, procurement, fabrication, examination, testing, repair, storage, handling and shipping of	0-19.xc-33.xc-
Radiation Monitoring Systems qualification levels 1EA, 1EB and 1EC; RSQ : 18.xx, 19.xx, 33.xx, 34.xx and 35.xx.	23 RSQ: 18:
at the above location from June 20 th , 2009 until March 1 th , 2013	AL COR: 9
Jos SLECHTEN Qualification Manager Nuclear Jos SLECHTEN Qualification Manager Nuclear	KZA-MAKGE AUTHORIMOZENSAD CAANGPAL COR: 923 RSQ: 16.1x-19.1x-33.1x-34.1x-35.1x
1 This authorization does not relieve its holder from his contractual obligations towards the Owner. By this authorization, Tractebel does not "approve", "certify", "rate", or "endorse" any product or construction.	1 22

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ON



Standard Quality Assurance requirements according ISO 9001:2008 are implemented and certified





IQNet is represented in the USA by: AFAQ AFNOR, CISQ, DQS, NSAI Inc, and SAI Global * The list of IQNet partners is valid at the time of issue of this certificate. Updated information is available under www.lone

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17.10.2012



German NPP Quality Assurance Requirements according KTA 1401 are confirmed by the authorities

EnBW

eon

RWE

Confirmation on quality assurance according to nuclear standard KTA 1401

On behalf of the German nuclear power plant operators RWE Power AG as a partner of the VGB PowerTech e.V. working group "Assessment of Contractors" confirms

Mirion Technologies (MGPI H&B) GmbH Landsberger Str. 328a, 80687 München

true for the site

80687 München

and the scope of supply and services

development, sales, project engineering, design, manufacturing, final inspection, documentation and service (training, maintenance and repair) of electrical and mechanical instruments and systems in the field of nuclear measurement

the qualification for system- and product related quality assurance.

The assessment was performed on 04.03.2010 by order of

AHA Ingenieurdienstleistungen GbR

based on the standard **KTA 1401** as well as on the assessment documents of the VGB PowerTech e.V. working group "Assessment of Contractors" in consideration of product related requirements.

Details of the assessment are given in the report AHA 02/2010.

This confirmation is valid until March 26^{th} , 2013 provided that the conditions on which the assessment was based have not been changed.

Essen, 25.03.2011

Ma. Future

i.A. dut

RWE Power AG

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Radiation Monitoring Systems Division

17.10.2012



QA Manager is trained according the 10 CFR 50 App. B and fulfils the lead auditors requirements

CERTIFICATE OF TRAINING AND EXAMINATION

Christine Renn

has successfully completed the nuclear lead auditor training course and passed a comprehensive written examination. This course provides the participant with training on the body of knowledge and written examination required for lead quality auditor in accordance with following specifications

> 10CFR50 Appendix B ASME NQA-1 ANSI N45.2.23

20-23 September 2011 Mirion Technologies Lamanon, France

Montie, Lead Instructor

Arsenal Consulting, Inc. www.NOA-1.com 23 September, 2011

Arsenal

Date

Extract of the examination content

The examination content is written to meet the requirements of NQA-1, 10 CFR 50 Appendix B, and ANSI N45.2 and includes questions to ensure that the participant has comprehension of and the ability to apply knowledge of the following:

- Nuclear standards including NQA-1, 10 CFR 50 Appendix B, ANSI N45.2 and other nuclear-related codes, standards, regulations, and regulatory guides, as applicable
- The ability to interpret the requirements and apply them to situations
- General structure of quality assurance programs as a whole and applicable elements
- Auditing techniques of examining, questioning, evaluating, and reporting
- Methods of identifying and following up on corrective action items and closing out audit findings
- Planning audits of activities affecting quality

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Software Quality Assurance is described and defined in the Software Quality Assurance Plan (SQAP) and shows compliancy to the IEEE 730

Purpose of the SQAP

- Describes and defines the procedures used during the software development process for the TK 250 system
- Identifies the documentation during the development, verification, validation, use and maintenance of the software product
- Describes the organizational elements responsible for the origination, verification, validation, maintenance and control of the required documentation
- Shows compliancy to the IEEE 730 standard (ref. to /2.9/) and with all demands from the IEC 60880 §5.5 ref. to /2.5/
- Applies to the software of those TK 250 systems, which are designed for the use in IEC 61226 category A or 1E applications (DAK 250, DGK 250, DWK 250, DMK 250, DSK 250, DLK 250)

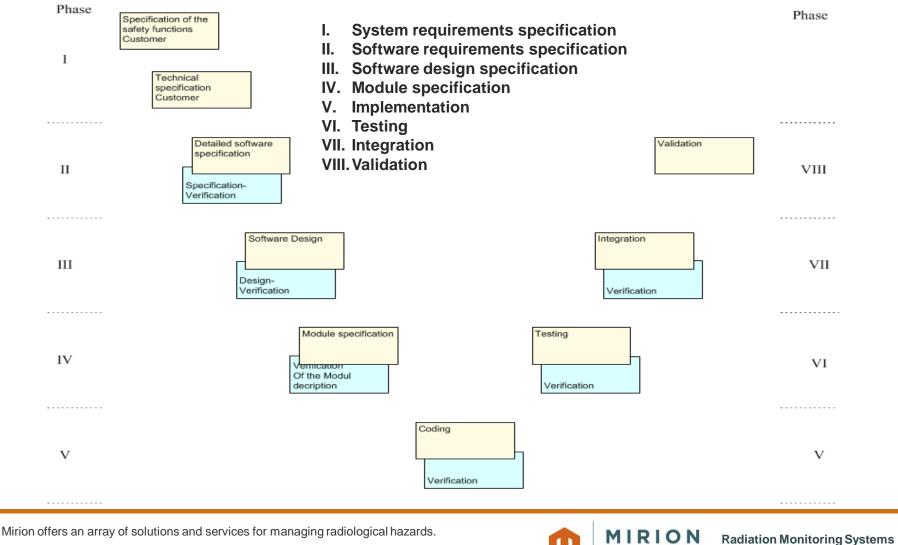
SQAP covers the following phases of the software life cycle

- Specification
- Design
- Implementation
- V&V
- Installation
- Commissioning
- Operation and maintenance

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10

Division

TECHNOLOGIES

17.10.2012



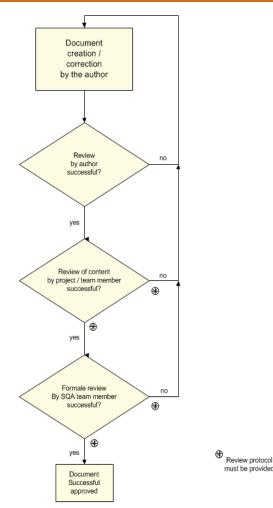
MGPI H&B documents are reviewed, updated & approved by independent authorized persons

Every document has to be approved by the following participants

- the author(s), to check for the correct content and the correct form
- a team member, or project member to check and sign for the correct content
- a member of the QA team to check and sign for the correct form

A verification report is created which contains information about

- the reviewer
- the reviewed activities and
- the reviewed results



MIRION

TECHNOLOGIES

Radiation Monitoring Systems Division

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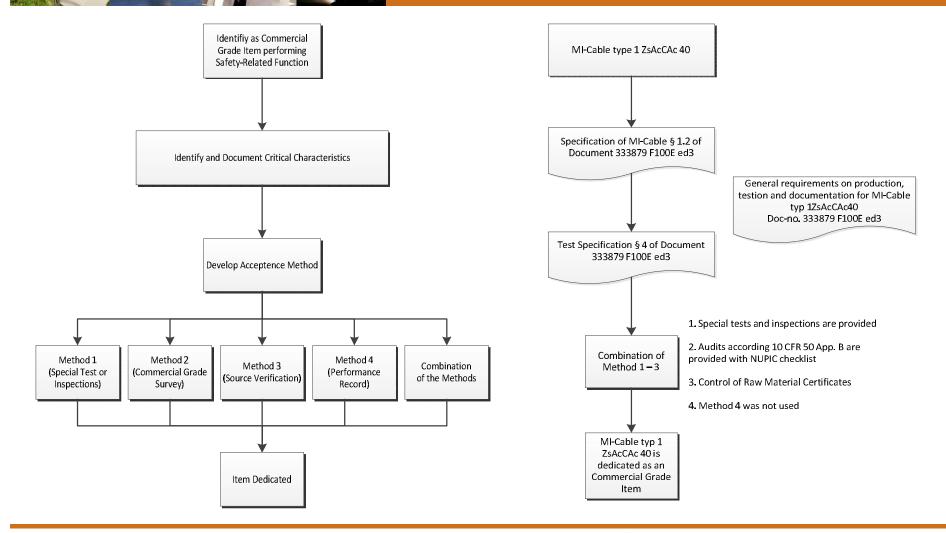


- When required for critical, sensitive, or high-value articles, specific procedures for handling, storage, packaging, shipping and preservation are provided
- When required special handling tools and equipment is utilized and controlled to ensure safe and adequate handling
- Operators of special handling are experienced and trained
- Instructions for marking and labeling for packaging, shipment, handling and storage of items are established

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MI-Cable type 1 ZsAcCAc 40 was dedicated as a Commercial Grade Item



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Purpose of Mirion Export Management and Compliance Program (EMCP) is to ensure that employees are consistently making the right export decisions

- Mirion EMCP includes the following information which applies to all sites, followed by separate section that relate to the local laws of each country in which Mirion has a site:
 - Management Commitment & Responsible Employees
 - Mirion Risk Assessment
 - Product Classification
 - Screening
 - Maintenance of Records
 - Auditing of Export Management and Complience
 - Training

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- Site Implementation
- The EMCP was fully implemented and audited in March 2011 at Mirion (MGPI H&B); the export control process is documented and trained on the procedure 0348661 A 12 ed1
- An export license from the German authority (BAFA) is required for the delivery of the equipment; End customer and end use has to be known; Delivery without export license is not possible

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Status Update on PLCs

- Use of industrial PLCs that have been approved by NRC, SIL 2 – SIL 4, qualification 1E
- Use of industrial PLCs that have not been previously approved by NRC

License Amendment

- SAR Revision
- Amendment to Technical Specifications
- Projected Schedule

Documentation Content

- Technical Report on DWK250
- Information on PLCs to be used
- Final logic circuit design & testing plan

NRC Guidance on Reviewing Digital I&C Systems for Non-Power Reactors

- MIT plans to document the new Mirion system as a change to the MITR Safety Analysis Report via 10 CFR 50.59 review, using NUREG 1537 and its newly proposed changes as guidance
- Changes within the 50.59 envelope are reported annually to NRC but do not require NRC approval prior to implementation; changes beyond the 50.59 envelope require license amendment and therefore do require prior NRC approval
- Potential mechanism is for NRC to require either an amendment to the Tech Specs or an entirely new section defining a new envelope of operation

Concluding Material

- Questions & Comments
- Contact Info:

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> > Phase 0 Public Meeting