

**NRCREP Resource**

**From:** Matt Gibson [matt.gibson@duke-energy.com]  
**Sent:** Monday, November 12, 2012 4:38 PM  
**To:** NRCREP Resource  
**Subject:** Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Matt Gibson ([matt.gibson@duke-energy.com](mailto:matt.gibson@duke-energy.com)) on Monday, November 12, 2012 at 16:37:55

Document\_Title: DG-1207, Software Test Documentation for Digital Computer Software Used in Safety Systems of Nuclear Power Plants (ML083370243)

Comments: 1. page 5, paragraph 4 This wording makes it sound like Integrity Level 4 is brand new in the standard. Integrity Level schemes are new 829 not just for level 4 but all levels. Not sure what is trying to be conveyed by the wording of this sentence. In relation to Position 6 discussion, I would suggest clarification that integrity level schemes are new in the standard and that the NRC considers Level 4 to be an adequate classification of software used in safety systems of nuclear power plants.

2. Page 7, section 1, paragraph 2: It is not clear in the second statement if the minimum acceptable information for the MTP is all of Clause 8 in 829. As long as we have items a - g in the regulatory guide, are parts of the Clause 8 MTP details omissible?

3. Page 7, Section 1a: Only Clause 9.3.6 mentions necessary skills and test training. There are no qualifications or skills identified in Clause 8. What additional training, skills and qualifications would be required other than what is identified in Clause 9.3.6?

Page 8, Section 3, Paragraph 1: Consider moving this discussion to an earlier section to better align with the order of 829. The previous section discusses items from Clause 8 & 9 whereas this section is discussing Clauses & 7.

Page 8, Section 3, Paragraph 2: This section discusses the allowance of combining testing documents. It omits the allowance of eliminating testing documents. Clause 6.4 allows both combination and elimination without distinction. Is it implied, then, because the NRC only discusses combining documents that elimination is not allowable? Why is only the lowering of level of integrity discussed as to what is not acceptable? This paragraph is not clear on what is acceptable and what is not acceptable within Clause 6.4. Interpretation could be made that since only lowering the integrity level is identified, fast tracking a project allows elimination of documents. Please clarify specifically what is acceptable and what is not.

Page 9, section 6, paragraph 1: The standard specifically states that it does NOT mandate the use of integrity level schemes (Page 14, first sentence of second paragraph: "This standard does not mandate the use of the integrity level schemes.") It further states in the paragraph, "The use of integrity level scheme is a recommended best practice..." Since the standard does not mandate it, the NRC needs to clarify if the regulatory guide will mandate it.

organization: Duke Energy

address1:

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8/22/2012  
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