

NRCREP Resource

From: Matt Gibson [matt.gibson@duke-energy.com]
Sent: Monday, November 12, 2012 4:32 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) on Monday, November 12, 2012 at 16:32:21

Document_Title: DG-1206, Configuration Management Plans for Digital Computer Software used in Safety Systems of Nuclear Power Plants (ML103200044)

Comments: DG-1206, Page 8, Section 6

1. Item 'k' in the list for documentation: "commercial software items that are safety system software". The first paragraph identifies all software deliverables of safety systems are to be identified and controlled as configuration items. Item 'a' states "requirements, designs, and code". There is no distinction about the type of code (source, object, executable), therefore the presumption is that all code which as already been stated in the first paragraph. Item 'k' seems to imply that there is something possibly different in "commercial software items" than what has already been explicitly defined by the first paragraph and Item 'a'. There is no definition provided as to what could possibly be "commercial software" that is not already included. Recommend this item be eliminated or clarification should be given.

2. DG-1206, Page 9, section 9

The "Downward Adaptation" in IEEE Std. 828-2005 allows for the omission of standard requirements where they do not apply to a project. An example standard requirement within IEEE 828-2005 is Section 3.1 where the scope of the SCM is defined. Item 'f' lists "Limitations, such as time constraints, that apply to the Plan". Item 'g' lists "Assumptions that might have an impact on the cost, schedule or ability to perform SCM activities (e.g., assumptions of the degree of customer participation in the SCM activities or the availability of automated aids)." These standard requirements may very well not apply to the safety system software under configuration control. If the Reg. Guide does not allow omission of standard requirements such as this when they do not apply, how is the user of the reg. guide capable of meeting it? Recommend clarification on what specifically are the standard requirements of concern that should not be omitted from a safety system software instead of a carte blanche nothing can be omitted.

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*SONSI Review Complete
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