

NRCREP Resource

From: Matt Gibson [matt.gibson@duke-energy.com]
Sent: Monday, November 12, 2012 4:41 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

RECEIVED

2012 NOV 13 PM 6:03

RULES AND DIRECTIVES
BRANCH
USNRC

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 16:41:10

Document_Title: DG-1209 Software Requirement Specifications for Digital Computer Software used in Safety Systems of Nuclear Power Plants (ML103080963)

Comments: DG-1209, page 7, section 2g: 830 does not state that each requirement is traceable to a higher level requirements specification. This would make an infinite backward traceability. It states that origin is clear. Backward traceability refers to previous stages of development NOT higher levels of requirements. The wording here does not capture the intent of 830 which is that if requirement origins are identified in earlier documents, backward traceability to those origins must be maintained.

DG-1209, page 7, section 2g: Not all requirements can be traced to specific licensing or design bases documents. For example, specific self diagnostic features of which ensure notification of component failures or HMI requirements found in standards such as HFES-100 can't be found in licensing or design bases documents. This is a level of detail not found in these documents but requirements may have their origins in other standards. Clearly the origins must be identified and design bases and regulatory requirements must be included but the requirements won't end up being limited to these origins. An additional example is provided by this regulatory guide below.

DG-1209, page 8, section 6c: Another example of requirements that do not originate in licensing or design bases.

organization: Duke Energy

address1:

address2:

city:

state: NC

zip:

country:

phone: 919-546-3425

8/22/2012
77 FR 50726
(2)

50 USC Review Complete
Template = ADM-013

E-REDS = ADM-03
Call = M. Orr (mpol)
M. Case (mjc)