

June 6, 2014

MEMORANDUM TO: Anthony J. Mendiola, Chief
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Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Shavon J. Edmonds, Project Manager */HCruz for RA/*
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SUBJECT: SUMMARY OF APRIL 17, 2014, MEETING DISCUSSING THE
UPDATED TOPICAL REPORT SUBMISSION OF ADVANCED LOGIC
SYSTEM BY WESTINGHOUSE ELECTRIC COMPANY
(WESTINGHOUSE)

On April 17, 2014, the staff from the U.S. Nuclear Regulatory Commission (NRC) held a meeting with representatives from Westinghouse Electric Company (Westinghouse). The purpose of this meeting was to discuss information regarding Westinghouse's potential licensing submittal of the updates of the Advanced Logic System topical report (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13298A094). A public meeting notice was issued on April 7, 2014, and is available at ADAMS Accession No. ML14084A301. The handouts are available in the ADAMS as Accession No. ML14087A150. A list of attendees at the meeting can be found in ADAMS at Accession No. ML14108A001.

In the opening remarks, the NRC staff discussed the agency's process for prioritization of topical reports (TRs). The NRC staff noted that TRs as a group are prioritized lower than safety-related work because although they improve NRC efficiency they are not needed for the NRC to do its safety work. The NRC staff also discussed how TRs are prioritized among themselves. To determine what priority a TR should receive, it is assigned points based on a number of attributes that reflect how extensive the TR will be used and how much progress has been made in its review. Some TRs tend to receive low priority in the review process because they are not far along in the review process or are not tied to any needed licensing action. The NRC staff also noted that if a letter of intent has been sent to the docket by a U.S. plant containing a formal license amendment request (LAR) or indicating a strong interest to implement the product at their site then the TR submittal could be viewed as a higher priority verses a TR submittal that does not contain that information. This prioritization methodology for TRs was discussed at a May 2012 meeting with industry.

As part of the company's program, Westinghouse conducted a nuclear safety briefing that focused on their company's new corrective action system and the changes that occurred within their organization transferring and updating information from the old system to the new system.

Next, Westinghouse presented its presentation entitled "Phase 0 Meeting: Update of the Advanced Logic System" (ADAMS Accession No. ML14087A150). In the introduction, Westinghouse representatives discussed the use of LIC-500, Rev. 4, "Topical Report Process," which provides a process for revisions to an approved TR. The NRC staff suggested that Westinghouse also use LIC-109, Rev. 1, "Acceptance Review Procedures" (ADAMS Accession No. ML091810088), which gives details on how to provide sufficient information for acceptance reviews. During the presentation, the NRC staff inquired about why the schedule for the ALS TR submittal was proprietary. The NRC staff indicated that in a typical TR submittal the schedule reflecting future document submittals are not proprietary.

The Westinghouse representatives indicated that the basis for the redaction of the scheduler is because of the marketing strategy of the platform. However, Westinghouse representatives stated that they will re-evaluate the schedule to determine whether the schedule will remain in a proprietary status. The NRC staff also questioned why some information on various slides was marked proprietary that could be marked non-proprietary. The Westinghouse representatives responded by taking an action item to review information from the presentation to determine whether a subset of information could be marked non-proprietary versus proprietary.

The NRC staff noted that they need to understand the difference of the non-significant and significant changes related to the updates in the TR submittal and how they impact NRC safety evaluation (SE) and the change evaluation process that may take place within the industry in the future.

The Westinghouse representatives discussed the role of CS Innovations (CSI) and its involvement in the ALS platform development. The NRC staff asked about the transitioning of CSI quality assurance program to Westinghouse's quality management system and how much expertise was retained within Westinghouse during this change process. The Westinghouse representatives indicated that all expertise involved with the ALS platform development from CSI remained with Westinghouse.

The NRC staff questioned the performance of equipment qualification (EQ) testing on the ALS platform system and its technical impact on the contents of the TR. The Westinghouse representatives indicated that the EQ section of the TR specifically describes the EQ program and does not give the results of any EQ testing activities.

The NRC staff had a question regarding verification and validation (V&V) activities related to a specific component in the ALS platform. The Westinghouse representatives indicated that independent V&V activities for components included simulation, tool assessment, and general review activities per the ALS development process. In conclusion, the NRC staff suggested that Westinghouse provide a rationale for changes made in the addendum of the TR submittal. The Westinghouse representatives committed to providing a rationale and ramifications of changes in the revision of the TR.

Action Items from the meeting included the following:

- Westinghouse committed to reevaluating the proprietary verses non-proprietary information in the slideshow presentations given during the meeting.
- NRC committed to providing Westinghouse an initial assessment of the TR priority list.
- Westinghouse committed to providing a delta rational for changes in the TR submittal.

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