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Sent: Wednesday, September 07, 2016 11:26 AM
To: Holonich, Joseph
Cc: AUSTGEN, Kati; REMER, Jason; RLHERB@southernco.com; FREGONESE, Victor
Subject: [External_Sender] Meeting Input

Joe, my comment in this area is that the NRC staff should review the wording that already exists (and has been endorsed) in NEI -01-01, when considering an appropriate interpretation and definition of what is “sufficiently low”.

I have underlined sections for emphasis:

Specifically, Section 3.2.2, last paragraph, Pages 3-5 and 3-6 state:

“For digital upgrades to such systems, the defense-in-depth and diversity in the overall plant design are analyzed to assure that where there are vulnerabilities to common cause software failure, the plant has adequate capability to cope with these vulnerabilities (see Section 5.2). This defense-in-depth and diversity analysis is considered a beyond design basis concern, reflecting an understanding that while not quantifiable, the likelihood of a common cause software failure in a high quality digital system is significantly below that of a single active hardware failure. The analysis is performed as part of the design process, as the results could affect the design of the digital upgrade”.

Specifically, Appendix A, page A-3 states:

“(i) Is there reasonable assurance that the dependability of the system is sufficient (i.e. the likelihood of failure is significantly below that of single, active failures)? Was the application software developed under a 10 CFR 50 Appendix B, QA program using a documented life-cycle development process? Does the design comply with industry and regulatory standards? Is there prior operating history for the digital device(s) and their firmware? Has the platform been pre-qualified through NRC review? Does the design include features to detect, annunciate, and/or mitigate faults? Has the system been tested under all normal and abnormal operating conditions?”

In addition, NRC Information Notice 2010-10, “Implementation of a Digital Control System under 10CFR50.59” cited NEI 01-01, section 3.2.2. as a requirement of what the licensee should have followed in the case of the LaSalle Unit 2, digital upgrade

Please include this comment as part of the meeting record.

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