

SummerRAIsPEm Resource

From: Gleaves, Bill
Sent: Wednesday, September 28, 2016 9:56 AM
To: SummerRAIsPEm Resource
Subject: Digital IC Testing Strategy NRC Comments.docx
Attachments: Digital IC Testing Strategy NRC Comments.docx

Attached to this email are NRC comments regarding a proposed Digital I&C strategy based on the meeting of 8.16.16 as summarized in adams document ML16257A436.

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Purpose	To discuss staff's planned actions to address AP1000 licensee concerns regarding digital instrumentation and control (I&C) testing strategy during the pre-operational test phase.
Discussion	<p>The AP1000 licensees (SNC and SCE&G) recently presented to the NRC staff at site meetings and inspections their proposed pre-operational digital I&C test strategy. The licensees are asking the NRC to comment on their desire to credit some factory testing of software logic during pre-operational testing. However, the licensees have not put any proposal on the docket for us to formally respond. This issue touches branches associated with licensing, I&C, initial test program, and construction inspection (Region II).</p> <p>The staff reviewed the power point slides presented by the licensees on this issue and identified the following high-level questions:</p> <ul style="list-style-type: none">• What is the particular concern? Are the licensees proposing something different from their licensing basis, or do they just want some assurance going forward?• What outcomes are the licensees desiring and what process do they anticipate will resolve this potential issue (e.g., letter, public meeting, inspection, license amendment)?• What testing do they plan to credit from factory testing? Is the scope of this issue just non-safety systems or does it involve safety-related systems too? Are there any factory tests that were not credited previously that would be credited during pre-operational testing?• How does this relate to the current license amendment under staff review to use the updated Common Q Software Program Manual? In the amendment request, SNC discusses a test strategy that is different from the current licensing basis.• How is this issue related to pre-operational test experience in China? For instance, how was the testing strategy, plans, and procedures modified due to unanticipated test results for digital I&C-related pre-operational tests in China? Do the licensees plan to credit any test results in China for U.S. AP1000 plants?• How do the licensees see credit for factory digital I&C testing impacting the Initial Test Program?
Path Forward	We will have a public meeting with the licensees at NRC HQ on this topic to address the questions above and other concerns that yet may be identified. This will help them to identify the steps forward.
Reference	NRC Memorandum titled "Summary of Public Meeting with South Carolina Electric and Gas Company, Southern Nuclear and Westinghouse Electric Company to Discuss the AP1000 Initial Test Program" in ADAMS at ML16257A436, September 13, 2016.