

NEI's Original Text

3.2.1.2 SSC Characteristics

During the original licensing process, the characteristics of SSCs in the facility may have been a consideration. In general, different SSCs may be equivalent, similar or identical to one another physically or functionally.

The UFSAR may explicitly or implicitly describe the characteristics of SSCs through diversity, separation, independence and/or redundancy discussions. With digital modifications, the new equipment has the potential to impact the diversity, separation, independence and/or redundancy of the SSCs implied by or described in the UFSAR.

To assist in determining the impact of a digital modification on the diversity, separation, independence and/or redundancy of the affected components, identify the characteristics of SSCs implied by or described in the UFSAR. Compare the proposed characteristics of SSCs with the existing characteristics of SSCs. The impact of any differences in the characteristics of SSCs on diversity, separation, independence and/or redundancy is then determined.

For redundant SSCs that must satisfy single failure criteria requirements, the following guidance applies:

1. The use of the same software in two or more redundant SSCs is ADVERSE because the independence of the SSCs has been reduced.
2. The use of different software in two or more redundant SSCs is NOT ADVERSE because the independence of the SSCs has been maintained.
3. The use of exactly the same or different hardware in two or more redundant SSCs is subject to the same licensing considerations as described in the UFSAR as those for non-digital SSCs and a conclusion of ADVERSE or NOT ADVERSE is determined in the same manner as for non-digital proposed activities.

Commented [CN1]: Comment 9: descriptions regarding implicit or indirect effects needs to be strengthened.

Commented [CN2]: Comment 11: Inconsistent use of criteria.

Commented [CN3]: Comment 6 & 7: This is the only criteria for what is adverse; additional criteria are needed.