

July 24, 2017

MEMORANDUM TO: Dennis Morey, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager */RA/*
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SUBJECT: SUMMARY OF THE MAY 22, 2017, MEETING
WITH WESTINGHOUSE REGARDING REVISIONS TO THE
COMMON Q TOPICAL REPORT (TAC NO. MF9636)

On May 22, 2017, U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from Westinghouse Electric Company (Westinghouse). The purpose of the meeting was to discuss revisions to WCAP-16096-P/NP-A, "Software Program Manual for Common Q Systems." Information pertaining to this meeting, including documents cited in this summary, can be found in the meeting package at Agencywide Documents Access and Management System Accession No. ML17114A085.

In the meeting, Westinghouse made a presentation documented in WAAP-10390-NP, "Software Program Manual for Common Q Systems Planned Revisions." This presentation discussed changes Westinghouse proposes to make and reported that the primary purpose of this revision was to specify a manufacturing factory-acceptance test (FAT). The FAT will be performed on an Nth of a kind system of the same design. As a result, the software program manual (SPM) will be revised to distinguish between system-validation tests and system-manufacturing tests as some system-validation testing will not be repeated for Nth of a kind systems.

The redefined FAT will be a manufacturing test to be applied for subsequent systems of the same design. Per the presentation, these manufacturing FATs would be allowed for Nth of a kind designs where system-integration testing has been performed as part of the design process and can be shown to be creditable to a particular application design.

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Westinghouse noted that a regression analysis will still be required to determine what additional system-validation tests must be performed due to changes made to the design prior to or part of a Nth of a kind FAT. The previously approved design-verification tests, called out by the SPM include module, unit, integration (Cabinet/Channel Integration Test and FAT [system-integration test]), and site-acceptance test. The NRC staff reported that its understanding was that a new system-validation test will be added and the FAT will be redefined to be the only integration testing necessary for Nth of a kind manufacturing test.

The NRC staff also asked about the scope of the new system-validation test. Westinghouse explained that it was the test that validated the requirements of the system. Since the requirements of the system contain hardware, software and integration requirements, the first of a kind test that has been historically performed (Cabinet/Channel Integration Test/ System Integration Test) met the requirements for both the design-verification and the manufacturing FAT test. As such, no additional FAT manufacturing test will be required for such systems since the system-validation test would include the manufacturing test cases for the system.

Although specifying a manufacturing FAT was the primary driver for the SPM revision, Westinghouse also discussed how it would like to revise the SPM to incorporate: 1) alternative methods used for the Advanced Passive (AP) 1000 Protection and Safety Monitoring System that are described in the AP1000 license amendment request that incorporated the 2013 version of the Common Q SPM (license amendment request 15-017 for Plant Vogtle, Units 3 and 4); and 2) an update to the Secure Development and Operational Environment Plan to a) be more consistent with NRC Regulatory Guide 1.152, Revision 2, b) focus on the secure development environment activities and c) have the secure operational environment activities be the responsibility of the licensee. As presented, the NRC staff did not have any concerns with these changes.

The NRC staff asked if Westinghouse had used its change process to make any of the SPM changes presented during the meeting. Westinghouse explained that it had not yet and would submit its evaluation for each change on the NRC's docket, in order to expedite the NRC's review. The NRC staff expressed concern that Westinghouse was not leveraging its change process to make these changes to ensure the SPM is up-to-date. Westinghouse explained the SPM was a governing document, and it is using the change process on lower-level implementing procedures.

Lastly, Westinghouse and the NRC staff discussed NRC resource availability and schedule for the NRC's review of the SPM. The NRC informed Westinghouse that a new priority scheme was created for topical reports and presented at the January 25, 2017, public meeting on topical report reviews. The NRC staff took the action to send Westinghouse a copy of the new prioritization matrix.

Westinghouse informed the NRC staff that it plans to submit the revised SPM topical report by the end of the summer 2017. The NRC staff stated it would likely perform the acceptance review within two months of the submittal, and at that time would provide a schedule for the NRC staff review. The NRC staff mentioned another vendor recently submitted a topical report, and there was about a year delay before the NRC staff would start the review.

Westinghouse solicited feedback from the NRC staff on the proposed changes. The NRC staff stated that, as presented, the new test strategy is a reasonable approach that can be applied to both new-plant and operating-plant projects. The NRC staff also did not see it being contrary to current regulatory guidance.

D. Morey

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SUBJECT: SUMMARY OF THE MAY 22, 2017, MEETING
WITH WESTINGHOUSE REGARDING POTENTIAL UPDATES
TO THE COMMON Q TOPICAL REPORT (TAC NO. MF9636)
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