



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 4, 2018

Eugene O'Donnell
Licensing and EQ Lead
HF Controls Corporation
1624 West Crosby Road
Suite 124
Carrollton, TX 75006

SUBJECT: ACCEPTANCE REVIEW AND REQUESTS FOR WITHHOLDING OF
"SUBMITTAL OF NON-PROPRIETARY INFORMATION FOR AMENDMENT 4
TO THE HFC-6000 SAFETY PLATFORM" (L-2018-TOP-0031)

Dear Mr. O'Donnell:

By letter dated August 6, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18235A146), HF Controls (HFC) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review Topical Report (TR) "Submittal of Non-proprietary Information for Amendment 4 to the HFC-6000 Safety Platform." Also submitted was an affidavit dated August 6, 2018, executed by yourself that the following information be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations*, Section 2.390 (10 CFR 2.390).

QAPM-PI, "Quality Assurance Program Manual," Rev M
RR901-107-03-PI, "EPRI TR 107330 RTM [Reactor Trip Module] FPGA [Field Programmable Gate Array] Controllers," Rev B
RR901-107-10-PI, "Amendment for HFC-FPGA System to HFC-6000 Safety Platform," Rev E
TR901-302-01-PI, "HFC-FPGA Control System of HFC-6000 Safety Platform Qualification Test Report," Rev B
VV901-300-10-PI, "HFC-6000 FPGA Test Specimen Design Description." Rev B
WI-ENG-108-PI, "FPGA Design, Implementation, and Test," Rev A

The non-proprietary versions of these documents can be found in ADAMS Package Accession No. ML18235A188.

The NRC staff has performed an acceptance review of the Amendment 4 submittal. As discussed on the September 27, 2018, call between the NRC staff and HFC, the staff cannot find sufficient details in the submittal to allow the staff to evaluate if the proposed design is acceptable for use. Supporting information may be available on the HFC SharePoint site that the NRC staff will review as part of its audit. However, the NRC staff cannot dig through this large volume of detailed information on the SharePoint site to find the salient items it needs. HFC needs to distill that information into a level that supports the proposed design in the Amendment 4 submittal. The NRC staff must rely on HFC of presenting a sufficiently detailed design in the submittal that allows the NRC staff to conduct its regulatory evaluation.

Although the NRC staff has found that the current Amendment 4 submittal is not sufficiently detailed to begin our review, HFC can supplement the submittal with additional information. When the Amendment 4 submittal is revised, the NRC staff will determine if the supplemental information is complete enough to make the TR sufficient for review.

Please provide the supplemental information within 60 days of the date of this letter. If the information is not provided within the 60 days, or if the information is found to be incomplete, the NRC staff will not be able to conduct an in-depth, technical review of the TR.

Section 170.21 of 10 CFR requires that TRs are subject to fees based on the full cost of the review. You did not request a fee waiver; therefore, the NRC staff hours will be billed accordingly.

With respect to the request for withholding the information in Amendment 4, HFC detailed the reasons in its affidavit.

The NRC staff has reviewed your application and the material listed above in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, has determined that the submitted information sought contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the version of the submitted information marked as proprietary will be withheld from public disclosure under 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, the agency may send copies of this information to its consultants working in this area. The NRC staff will of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC staff.

You also should understand that the NRC staff may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have questions regarding this matter, please contact Joseph J. Holonich at 301-415-7297 or via electronic mail at Joseph.Holonich@nrc.gov.

Sincerely,

/RA/

Dennis C. Morey, Chief
Licensing Processes Branch
Division of Licensing Projects
Office of Nuclear Reactor Regulation

Docket No. 99902026

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 DATE: OCTOBER 4, 2018

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ADAMS Accession No.: ML18240A003 *concurrence via email NRR-106

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NAME	JHolonich	DHarrison	DTaneja	DMorey
DATE	10/03/2018	09/18/2018	10/03/2018	10/4/2018

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