

October 27, 1994

Geraldine C. Main
Chair, ANS 10.3 Working Group
BCS Richland, Inc.
A2-90
P.O. Box 300
Richland, Washington 99352

Dear Ms. Main:

SUBJECT: ANS 10.3 STANDARD VOTE

During review of your reply to our comments concerning ANS-10.3, "Documentation of Computer Software," an additional comment was identified. We would like to request that a statement be placed in the foreword of the standard that "Documentation requirements for on-line monitoring, control, and safety systems are not covered in this document." If desired, it can be further stated that "Requirements for documentation of such systems for nuclear power plant applications are given indirectly in IEEE 7-4.3.2-1993, and directly in IEC-880 1986."

Our concern and basis for our comments is that users may try to use Section 5 of this standard for the documentation of commercial off-the-shelf (COTS) software. The use of a benchmark problem for COTS software for on-line monitoring, control, and safety systems may not be an approach that is complete enough for this type of software.

If you have any questions concerning our comments, please contact me at 301-504-1127.

Sincerely,
Original signed by
Alexander Adams, Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Project Support
Office of Nuclear Reactor Regulation

cc: T. Raby, NIST

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Sincerely,

A handwritten signature in cursive script, reading "Alexander Adams, Jr.", is positioned above the typed name.

Alexander Adams, Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
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Office of Nuclear Reactor Regulation

cc: T. Raby, NIST