
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

04/13/2026

**SAFETY SYSTEM DIGITAL PLATFORM
- MELTAC (MITSUBISHI ELECTRIC TOTAL ADVANCED CONTROLLER) -
ASPM and CGD**

Mitsubishi Electric Corporation

EPID: L-2024-TOP-0036
RAI NO.: RAI 18
DATE OF RAI ISSUE: 03/10/2026

RAI 18

Background and Issue: As incorporated by reference in regulation 10 CFR 50.55a(h), IEEE Std 279-1971, Clause 4.3 states, in part, that quality of components is to be achieved through the specification of requirements known to promote high quality, such as requirements for design, inspection, and test. Similar criteria for the quality of components are identified in Clause 5.3 of IEEE Std 603-1991.

In Section 3.6.6.4, "Maintenance of Commercial Dedication," of JEXU-1041-1032-P (R1), it states, in part, that "COTS [Commercial-off-the-shelf] is a type of a predeveloped product, and when this is the case, it shall be dedicated by the CGD method in order to be applied for a safety system." In the same section it states, in part, that [[

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The NRC staff found that it is not clear what CGD method will be used in the revised ASPM, JEXU-1041-1032-P (R1). It is not clear how the future target application software is prevented from using any COTS. The NRC staff found that the above two sentences quoted appear to conflict with each other.

Request: Please provide additional information to clarify:

1. Which CGD method will be used in this revised ASPM to meet NRC regulatory requirements and if the CGD method to be used conforms to that included in Summary of MELTAC Platform CGD Activity, JEXU-1041-1124-P (R1).
2. The seeming inconsistency between the two statements in Section 3.6.6.4 of the ASPM Revision 1 pertaining to the use of COTS.

ANSWER:

1. [[

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2. Since the description was unclear, MELCO will revise ASPM as shown in the attachment.

Impact on Topical Report and/or Support Documents.

MELCO will revise Section 3.6.6.4 of the MELTAC Platform Application Software Program Manual.

accordance with the SVVP and STP (Sections 3.10 and 3.12, respectively). After completion of the installation activities, all documentation in terms of the design changes of the target software and accepted deviations and justification for the acceptance shall be packaged as as-built records by the customer engineering organization.

3.6.6.4 Maintenance of Commercial Dedication

This section describes the response to the requirement of COTS described in [Section 5.4.2 of IEEE Std. 7-4.3.2 Clause 5.17 of IEEE Std. 7-4.3.2-2016](#) that is endorsed by RG 1.152 R4 (Reference 23).

RG 1.152
Pattern-3

The MELTAC platform is a predeveloped product from the viewpoint of application software. COTS is a type of a predeveloped product, and when this is the case, it shall be dedicated by the CGD method in order to be applied for a safety system.

The MELTAC platform is a Class 1E product as described in "Safety System Digital Platform - MELTAC - Topical Report" (JEXU-1041-1008). Therefore it is not COTS and the requirement for the COTS described in [Section 5.4.2 of IEEE Std. 7-4.3.2 Clause 5.17 of IEEE Std. 7-4.3.2-2016](#) is not applicable to the MELTAC platform.

RG 1.152
Pattern-3

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RG 1.152
Pattern-3

RAI 18-1

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There are no commercial grade items used in the application software applying to the target plant system. All systems, structures and components in the target plant system use the qualified MELTAC platform including the basic software as described in "Safety System Digital Platform - MELTAC - Topical Report" (JEXU-1041-1008), are produced and maintained as basic components to comply with 10 CFR 50 Appendix B. Therefore, there is no maintenance of commercial dedication activities applicable to the target plant system.

3.6.6.5 Retirement

The retirement activities shall be performed in accordance with Clause A.4.4 of IEEE Std. 1074-2006 by the organizations described in Section 3.6.2 of this document. The implementation of the detailed activities and responsibilities shall be project-specific ~~and shall be described in the Application Licensing Documentation~~ and outside the scope of this document. When the site activities are necessary, the process will mutually be established by the customer engineering organization.

RAI 13
RAI 15

3.6.6.5 Configuration Management

Configuration management of the application software shall be performed as described in the SCMP (Section 3.11).