

NUREG-1537 Section 7.3, Reactor Control System (RED = existing text, BLUE = new text)

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7.3	<p>Reactor Control System</p> <p>The RCS performs several functions, such as maintaining the reactor in a shutdown state, reactor startup, changing power levels, maintaining operation at a set power level, and shutting down the reactor. In non-power reactor designs that allow pulsing (such as the TRIGA design); the RCS can rapidly insert reactivity into the reactor core to produce a predetermined high-power pulse of short duration, or to achieve a rapid increase in reactor power in a "square wave." The RCS may be discussed using such subsystems as nuclear instruments, process instruments, control elements, and interlocks. In describing each subsystem in the SAR, the applicant should include design considerations and technical specification requirements.</p> <p>In the nuclear instrument system, nuclear instruments monitor the neutron flux' from the subcritical source multiplication range, through the critical range, and' through the intermediate flux range to full power. Neutron flux instruments also should determine the startup rate and, in some designs, reactor period information.</p> <p>Linear and log neutron flux channels should be used to monitor the core neutron flux while control rods are withdrawn or inserted to increase or decrease reactor -power. At least one linear neutron flux channel should be calibrated to reactor thermal power.</p> <p>The process instruments are designed to measure and display such parameters as coolant flow, temperature, or level; fuel temperature; or air flow parameters within or from the reactor room. In some designs, this information may also be sent to the RPS.</p> <p>The typical non-power reactor has an automatic control (servo) system that controls the reactor power about a point set by the operator. Most servo control systems compare the output of a linear neutron flux channel against an adjustable voltage representing the desired power level; and automatically change the position of a regulating rod in the core to change the neutron flux density to reduce the difference between the two voltages until the actual reactor</p>	<p>Reactor Control System</p> <p><i>Areas of Review</i></p> <p>The RCS contains most of the I&C subsystems and components designed for the full range of normal reactor operation. The areas of review for the RCS should include a discussion of the factors requested in Section 7.2 of the format and content guide. The information for the RCS may be presented under the following subtopics:</p> <ul style="list-style-type: none"> nuclear instruments—including all detector channels designed to monitor or measure nuclear radiations, and possibly fuel temperature within the reactor for operational purposes process instruments—instruments designed to measure and display such parameters as coolant flow, temperature, or level; fuel temperature; or air flow parameters within or from the reactor room control elements—types, number, function, design, and operating

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	<p>power level is very nearly equal to the desired power level. This process can be performed by analog control equipment or by software in a digital computer system.</p> <p>Reactors with pulsing capabilities have a transient rod that, on command, is rapidly ejected out of the core to a pre-programmed distance. This action rapidly inserts a known amount of excess reactivity into the core that pulses the core power to very high levels for very short intervals. The system can also be used to form a square wave power increase to a predetermined steady-state power level.</p> <p>The RCS for non-power reactors should have a set of equipment protection interlocks and inhibits that prohibit or restrict operation of the reactor unless certain conditions are met. For example, there should be an interlock that prohibits control rod motion unless the neutron flux in the core produces a neutron count rate sufficient to help ensure that nuclear instruments are responding to neutrons. There may be additional equipment protection interlocks to ensure, for example, that there is sufficient coolant flow, shielding is intact, ventilation air is flowing, coolant level is sufficient, and required neutron instruments and recorders are functional. There may also be personnel protection interlocks to prevent reactor operation if certain radiation fields are excessive. Control rods may be run back to automatically reduce the reactor power when certain specified reactor conditions approach a predetermined limit, but total reactor shutdown (scram) is not warranted.</p> <p>Experimental facilities may be interlocked with the RCS to prevent reactor operation if the experimental facility is not in the correct configuration. If experiments conducted in non-power reactors could interact with the core to change reactivity or otherwise modify the reactor operating conditions, data to the RCS or RPS from the experiment instruments may be needed to detect reactivity changes. All experiments should be carefully considered for interaction with the I&C system when the safety analysis for the experiment is performed. The analysis should consider any interaction with the RCS or RPS. Where such interactions are warranted, they should meet the standards used for the design of the systems to which the experimental facilities will be connected.</p>	<p>features of reactivity control devices other than fuel elements (coordinate with the review of Chapter 4, "Reactor Description")</p> <ul style="list-style-type: none"> interlocks—circuits or devices to inhibit or prevent an action, such as control rod motion, unless a specified precondition exists. Interlocks are intended to protect personnel or other subsystems from harm.
	<p>Title 10, Section 50.34(a) of the Code of Federal Regulations describes the information to be</p>	<p>The areas of review for the RCS should also</p>

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	<p>supplied in a PSAR while 50.34(b) describes the information to be supplied in an FSAR. More specifically, 10CFR50.34(a)(3)(i) requires applicants to provide the principal design criteria for the facility and 10CFR50.34(a)(3)(ii) requires applicants to describe the design bases and the relation of the design bases to the principal design criteria.</p> <p>The applicant should include the following for each RCS subsystems:</p>	<p>include the following:</p> <ul style="list-style-type: none"> criteria, bases, criteria, standards, and guidelines used for the design of the RCS. a discussion of the criteria for developing the design bases for the RCS I&C system, including the basis for evaluating the reliability and performance of the I&C systems.
	<ul style="list-style-type: none"> A Discuss description of the design criteria for the RCS as outlined in Section 7.2.1, including any criteria specific to the reactor design not outlined in the section. <p>10CFR50.34(a)(3)(i) requires applicants to provide the principal design criteria for the facility. The principal design criteria establish the necessary design, fabrication, construction, testing, and performance requirements for structures, systems, and components important to safety; that is, structures, systems, and components that provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public.</p> <p>Types of design criteria that should be considered include, but are not limited to:</p> <ol style="list-style-type: none"> Consideration of the need to design against single failures (e.g., I&C systems should be designed so that a single failure will not prevent the safe shutdown of the reactor), Consideration of redundancy and diversity requirements, Consideration of the type, size, and orientation of possible breaks in components of the reactor coolant boundary in determining design requirements to suitably protect against postulated loss-of-coolant accidents, and 	

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	<p>4. Consideration of the possibility of systematic, nonrandom, concurrent failures of redundant elements in the design of protection systems and reactivity control systems.</p> <p>The basis for evaluating the reliability and performance of the I&C systems should be included. All systems and components of the I&C systems should be designed, constructed, and tested to quality standards commensurate with the safety importance of the functions to be performed. Where generally recognized codes and standards are used, they should be named and evaluated for applicability, adequacy, and sufficiency.</p>	
	<ul style="list-style-type: none"> • A Discuss description of the design bases information specified in Section 7.2.2 and any additional design bases of facility-specific subsystems. <p>10CFR50.34(a)(3)(ii) requires applicants to describe the design bases and the relation of the design bases to the principal design criteria.</p> <p>Design bases means that information which identifies the specific functions to be performed by a structure, system, or component of a facility, and the specific values or ranges of values chosen for controlling parameters as reference bounds for design. These values may be (1) restraints derived from generally accepted "state of the art" practices for achieving functional goals, or (2) requirements derived from analysis (based on calculation and/or experiments) of the effects of a postulated accident for which a structure, system, or component must meet its functional goals.</p> <p>The design bases should identify modes of operation, environmental parameters, safety functions, permissive conditions, variables to be monitored and their ranges, conditions for manual control, and any other special design bases that may be imposed on the system design (e.g., interlocks). For example, the modes of operation at a facility may require a period meter; this should be identified in the design basis because some pulse reactors may not need a period meter. For the control system, the design bases should demonstrate that the RCS is not required for safety.</p>	<ul style="list-style-type: none"> • a review of the criteria for developing the design bases for the RCS I&C system, including the basis for evaluating the reliability and performance of the I&C systems should be provided. • a review of the design bases of the RCS to confirm that the control systems include the necessary features for manual and automatic control of process variables within prescribed normal operating limits. • a review to confirm that the RCS is not required for safety and that there is a protection system to protect against failures of the control system.
	<ul style="list-style-type: none"> • A Discuss description of the system as specified in Section 7.2.3, including any additional 	<ul style="list-style-type: none"> ▪ a description, including logic, schematics,

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	<p>system descriptive material specific to subsystem design and implementation not covered in Section 7.2.</p> <p>Title 10, Section 50.34(a) of the Code of Federal Regulations describes the information to be supplied in a PSAR while 50.34(b) describes the information to be supplied in an FSAR. The range of the sensors should cover the range of the accidents.</p> <p>All applications should provide sufficient detail to allow an evaluation on the basis of their technical content and completeness. The system description of the RCS should include equipment and major components as well as block, logic, and schematic diagrams, including hardware and software descriptions and software flow diagrams for digital computer-based systems. The descriptions should also address how the system operational and support requirements will be met and how the operator interface requirements will be met. The applicant should include a description of the design criteria for the RCS as outlined in Section 7.2.3 (Part 1), including any additional system descriptive material specific to subsystem design and implementation not covered in Section 7.2.</p>	<p>and functional diagrams, of the overall system and component subsystems. The system description with diagrams and auxiliary information should be sufficiently complete to allow a thorough review of all aspects of the RCS including normal /abnormal operation, maintenance, and accident scenarios.</p> <ul style="list-style-type: none"> ▪ analysis of the adequacy of the design to establish conformance to the design bases and criteria for reactor power, rate of power change, and pulsing information ▪ analysis of the adequacy of the design to establish conformance to the design bases and criteria for information on required process variables to control reactor operation ▪ application of the functional design and analyses to the development of bases of technical specifications, including surveillance tests and intervals ▪ RCS failure modes to determine if any malfunction of the RCS could prevent the RPS from performing its safety function, or could prevent safe shutdown of the reactor.
<ul style="list-style-type: none"> • An analysis of 	<p>Analyze the operation and performance of the system as specified in Section</p>	<p>Acceptance Criteria</p>

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	<p>7.2.4 including analyses and results of any features or aspects specific to the facility design and implementation not specified in Section 7.2. The applicant should include Include the bases of any technical specifications and surveillance tests with intervals specific to the design and operation of the systems.</p> <p>In its analysis of the operation and performance of the RCS, the applicant should address Address the specific design features of the RCS, such as the following:</p>	<p>The acceptance criteria together with the use of good engineering practice will help the reviewer to conclude whether the RCS is designed to provide for the reliable control of reactor power level, rate of change of power levels, and pulsing (if applicable) during reactor startup, the fill range of normal operation, and shutdown. Acceptance criteria include the following:</p>
Design Basis		
1	<p>10CFR50.55a(a)(1) requires that structures, systems, and components be designed, fabricated, erected, constructed, tested, and inspected to quality standards commensurate with the importance of the safety function to be performed. The design of the control system should be of sufficient quality to limit the potential for inadvertent actuation and challenges to safety systems. While the design of a control system that minimizes inadvertent actuations and challenges to a safety system is good practice, there is no specific requirement for such design practice in reactor applications for which no transients occur. That is, inadvertent actuation may not be a concern for research reactors below 2 MW and TRIGAs.</p> <p>Provide a description of the quality program for the RCS.</p>	<p>The control systems should be designed and of sufficient quality to minimize the potential for challenges to safety systems. Confirm that the licensee has implemented a management control system that references or cites industry standards for the design, purchasing, installing, and testing of the RCS.</p>
2	<p>Managerial and administrative controls are used to assure safe operation. Section 50.34(a)(7) of 10 CFR requires that applicants for construction permits describe a quality assurance program for the design and construction of the structures, systems, and components of the facility. Section 50.34(b)(6)(ii) requires a description in the SAR of managerial and administrative controls to be used to ensure safe operation. ANSI/ANS 15.8-1995, endorsed by RG 2.5, provides an acceptable method in developing a quality assurance program for the design, construction, testing, modification, and maintenance of research and test reactors for complying with the program requirements of 10CFR50.34.</p>	<p>Review the licensee's QA program to confirm the establishment of a quality assurance program that provides controls over the design, fabrication, installation, and modification of the RCS and experimental equipment to the extent that these impact safety-related items. The licensee meets the guidance of ANSI/ANS 15.8-1995, as endorsed by RG 2.5, in developing a quality assurance</p>

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		program for complying with the program requirements of 10 CFR 50.34, subsections (a)(7) and (b)(6)(ii).
		For I&C systems that are being upgraded to systems based on digital technology, the applicant should consult NRC Generic Letter 95-02, "Use of NUMARC/EPRI Report TR-102348, Guideline on Licensing Digital Upgrades, in Determining the Acceptability of Performing Analog to Digital Replacements Under 10 CFR 50.59." [NOTE: Because this applies to all sections it was updated and moved to the introduction of Chapter 7.]
3	The reactor control systems should be capable of maintaining system variables as defined in Section 7.2.3 (including the neutron flux density) within prescribed operating ranges. Thus, the system should monitor variables and systems over their anticipated ranges for normal operation (from subcritical multiplication source level through the full licensed power range) defined in Section 7.2.2, for postulated accidents, and for accident conditions as appropriate to assure adequate safety, including those variables and systems that can affect the fission process, the integrity of the reactor core, the reactor coolant pressure boundary, and the containment and its associated systems. The sensors must adequately cover the range of operations and accident conditions and should be based on the accident conditions evaluated in Chapter 13. The sensors in the RCS gives a continuous indication of the neutron flux density from subcritical multiplication source level to the expected power ranges evaluated in other parts of the SAR. through the full licensed power range. If multiple detector channels are used, this continuous indication should overlap a minimum of one decade during detector changeover.	Verify that the The range of operation of sensor (detector) channels should be is sufficient to cover the expected range of variation of the monitored variable during normal and transient (pulsing or square wave) reactor operation.
4		Verify that the The RCS provides should give continuous indication of the neutron flux from subcritical source multiplication level through the licensed maximum power range. This continuous indication should ensure about one decade of overlap in indication is maintained while observation is transferred from one detector channel to another.
5		Verify that the The sensitivity of each sensor channel is should be commensurate with the precision and accuracy to which knowledge of the variable measured is required for the

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		control of the reactor.
6	The RCS design analysis includes verification that instrumentation and systems, along with the data processing systems and alarms, will reasonably assure operation within specified design limits. The analysis of the design should provide assurance that I&C systems can adequately monitor changes in core reactivity and maintain variables that affect core reactivity within designed operating ranges, thus minimizing the possibility of an adverse transient affecting the integrity of the primary fission product barrier (e.g., fuel cladding).	Confirm that the The system provides should give reliable reactor power level and rate-of-change information from detectors or sensors that directly monitor the neutron flux.
7		Confirm that the The system provides should give reliable information about the status and magnitude of process variables necessary for the full range of normal reactor operation.
8	With respect to provision of I&C to monitor variables and systems that can affect the fission process, the applicant should: <ul style="list-style-type: none"> Provide a description of the analysis that demonstrates that suitable instrumentation and systems are provided to monitor the core power, control rod positions and patterns, and other process variables such as temperature and pressure, as applicable. 	Confirm that the The system is should be designed with sufficient control of reactivity for all required reactor operations including pulsing, and to ensure compliance with analyzed requirements on excess reactivity and shutdown margins.
9	<ul style="list-style-type: none"> Provide a description of the analysis that demonstrates that suitable alarms and/or control room indications for these monitored variables are provided. 	Confirm that the The RCS provides should give redundant reactor power level indication through the licensed power range (i.e., redundant sensors with their own display).
10	In addition, the applicant should provide a description of the specific design features of the RCS should address the following: <ul style="list-style-type: none"> Detector channels directly monitor the neutron flux density for presentation of reactor power level and power rate-of-change. 	Confirm that the The location and sensitivity of at least one reactor startup channel, along with the location and emission rate of the neutron startup source, is should be designed to ensure that changes in reactivity will be reliably indicated even with the reactor shut down (see Chapter 4).
11	<ul style="list-style-type: none"> The RCS has at least two channels of reactor power indication through the licensed power range. The startup and operating power detector channels can discriminate against 	Confirm that a A startup channel with interlock provides should give indication of neutrons and should prevent reactor startup (increase in reactivity) without sufficient neutrons in the core.

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12	<p>strong gamma radiation, such as that present after long periods of operation at full power, to ensure that indicated changes in neutron flux density are reliable.</p> <ul style="list-style-type: none"> The reactor power indication of at least one channel should remain reliable for some predetermined range above the licensed power level. For reactors with power level as a safety limit, the instrumentation should be able to indicate if the safety limit was exceeded. For other reactor types, at least one channel should be able to indicate if the power level, which is the basis for limiting licensed power level, was exceeded. 	<p>Confirm that the The startup and low-power range detectors is should be capable of discriminating against strong gamma radiation, such as that present after long periods of operation at full power, to ensure that changes in neutron flux density are reliably measured.</p>
13	<ul style="list-style-type: none"> All control rod positions should be indicated at the control console throughout their travel and should indicate when they are at an "in" or "out" limit. 	<p>At least one neutron flux measuring channel provides should give reliable readings to a predetermined power level. For reactors with power as a safety limit, the measurable power level should be above the safety limit. For reactors without power as a safety limit, the measurable power level should be high enough to show that the basis for limiting licensed power level is not exceeded.</p>
14	<p>A summary of the analysis used to confirm the adequacy of control systems with respect to maintaining variables within operational limits during facility operation and to confirm that the impact of control system failures is appropriately included in the maximum hypothetical accident analyses. The applicant should summarize in this section of the SAR why the system design is sufficient and suitable for performing the functions stated in the design bases.</p>	<p>The automatic and manual control element absorber, drive, and display systems are should be designed to limit reactor periods and power oscillations and levels to values found acceptable in the reactor dynamic analyses in Chapter 4 of the SAR, and rod and driver positions should be clearly indicated for operator or interlock use.</p>
15	<p>Show that RCS is designed for reliable operation in the normal range of environmental conditions anticipated within the facility. If environmental controls such as heat tracing of instrument lines or cabinet cooling fans are necessary to protect equipment from environmental conditions, these should also be described.</p>	<p>The RCS should be designed for reliable operation in the normal range of environmental conditions anticipated within the facility. Verify that the licensee has shown that the specifications on the I&C are within the bounds of the normal range of environmental conditions.</p>

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16	<p>Maintaining system performance provides the basis for the technical specifications of non-power reactors (Ch. 14), consistent with the safety analysis with respect to reliability, availability, and capability of the RCS.</p> <p>Show that the capability of the RCS is addressed by limiting or enveloping conditions of design and operation, such as:</p> <ul style="list-style-type: none"> • The control rod drive speed in "manual" and "automatic" modes of operation should be limited to that analyzed and allowed for controlling the rate of change of reactivity. • The RCS and the reactor reactivity control system should meet the requirements of minimum shutdown margin considering the stuck rod criteria. <p>Factors in experiments which could adversely affect control system features include:</p> <ol style="list-style-type: none"> a. Neutron flux perturbations affecting calibrations of safety channels and/or rod worths. b. Mechanical forces adversely affecting shielding or confinement arising from causes as in mechanical forces on fuel cladding arising from the manipulation of experimental components, from tools used for such manipulation, from thermal stress, vibration, or shock waves, or from missiles arising from functioning or malfunctioning experiments. c. Radiation fields or radioactive releases from experiments which can mask the performance of an operational monitoring system intended for the detection of fission product releases at early stages. d. Physical interference by experiment components with reactor system components such as control or safety rods or physical displacement of reactor system shielding. <p>Describe the factors in experiments that can adversely affect control system</p>	<p>Technical specifications, including surveillance tests and intervals, should be based on SAR analyses and should give the necessary confidence in availability and reliable operation of detection channels and control elements and devices.</p> <p>Verify that the licensee has identified those I&C functions and variables to be probable subjects of technical specifications for the facility. The rate of change of reactivity of any unsecured experiment, any movable experiment, or any combination of such experiments introduced by intentionally setting the experiment(s) in motion relative to the reactor should not exceed the capacity of the control system to provide compensation.</p>

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	<p>features and any associated technical specifications arising from experimental systems.</p> <p>Describe plans for installation of software on installed systems in operating plants, recognizing the need to declare all affected functions inoperable according to the plant's technical specifications before proceeding with installation, and to conduct appropriate return-to-service testing before declaring the modified function operable.</p>	
17	<p>The RCS has a reactor period channel that covers subcritical neutron source multiplication from the approach to critical, through critical, and into the licensed power range. Depending on the analysis in the SAR, some reactors may not have this channel.</p> <p>If the design basis requires the use of period meters, show that the reactivity control systems are designed with appropriate limits on the potential amount and rate of reactivity increase to assure that the effects of postulated reactivity accidents cannot impair significantly the capability to cool the core. These postulated reactivity accidents shall include consideration of reactivity addition accidents (e.g., ramp, pulse, experiments, etc.), as applicable.</p>	<p>If required by the SAR analysis, confirm that the system provides should give a reactor period or a startup rate indication that covers subcritical neutron multiplication, the approach to critical, through critical, into the operating power range.</p>
18	<p>Demonstrate that any single control system component or channel, or failure or removal from service of any single protection system component or channel which is common to the control and protection systems, shall leave intact a system satisfying all reliability, redundancy, and independence requirements of the protection system.</p>	<p>Confirm that all interfaces between control systems and protection systems have been properly identified and addressed, thereby preserving the reliability, redundancy, and independence requirements of the protection system.</p>
19	<p>In a reactor designed for pulsing, provide an analysis that shows that the movement of the transient rod should be is limited in accordance with reactivity amounts and rates derived from the SAR analysis.</p> <p>In a reactor designed for pulsing, provide a description of the system indication for should indicate the position of the transient rod, when this rod is fully inserted, and</p>	<p>For reactors designed for pulsing or "square-wave" operation, confirm that the transient rod and its driver mechanism, interlocks, mode switching, detector channels, other related instruments, and limiting technical specifications are should be designed for the</p>

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	when it is set in position to initiate a pulse, and describe the should provide interlocks to ensure the position of the rod.	highest possible reliability to ensure that analyzed fuel safety limits will not be exceeded, and personnel hazards will be controlled. Designs should be compared with such systems accepted by NRC for similar operations or reactors.
20	The features for manual and automatic control facilitate the capability to maintain facility variables within prescribed operating limits. Provide a description of how the control systems permit actions to be taken to operate the facility safely during normal operation, including postulated accidents.	Confirm that the control systems includes the necessary features for manual and automatic control of process variables within prescribed normal operating limits. Functionality, which is included beyond the necessary minimum, should be reviewed to confirm that unintended consequences of any added feature have been considered.
21	<p>The control console and display system should indicate the mode of operation. For example, While in "automatic" reactor control mode, the RCS should indicate the operating mode, status and change of status of the reactor control mode at all times for facilities with any automatic control modes. being placed in or removed from automatic control.</p> <p>Provide a description of the displays available to the operator indicating the mode of operation, status, and change of status for automatic and manual control.</p>	Confirm that the control console and display system indicates the mode of operation, status, and change of status of the reactor control mode at all times for facilities with any automatic control modes.
Effects of control system operation/failures		
22	The conclusions of the analysis of postulated accidents and accidents as presented in Chapter 13 of the SAR are used to confirm that facility safety is not dependent upon the response of the control systems. In addition, failure of the control systems themselves or as a consequence of supporting system failures, such as loss of power sources, should not result in facility conditions more severe than those described in the analysis of maximum hypothetical accident and postulated accidents. Show that the accidents analyzed in Chapter 13 of the SAR do not depend on the operability of the RCS to assure safety.	Verify that any mitigation of the Maximum Hypothetical Accident or potential accidents analyzed in Chapter 13 of the SAR do not rely on the operability of the reactor control system function to assure safety.

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	If the RCS and RPS are separate systems, the safety functions should be placed on the protection system. This requirement does not apply to a combined RCS-RPS.	
23	<p>The RCS protects against a failure or operation in a mode that could prevent the RPS from performing its intended safety function. The design of the control system should consider the following:</p> <ul style="list-style-type: none"> • effects of control system operation upon accidents, • effects of control system failures, and • effects of control system failures caused by accidents. <p>The applicant should address failure of any control system component or any auxiliary supporting system for control systems to verify that facility conditions are bounded by the analysis of postulated accidents in Chapter 13 of the SAR. While failure analyses typically address random hardware failures, this evaluation should also address failure modes that could be associated with software failures.</p> <p>The SAR should contain a review that confirms that the consequential effects of postulated accidents and accidents are bounded by the accident analysis in Chapter 13 of the SAR. Finally, the review should confirm that the safety analysis includes consideration of the effects of both control system action and inaction in assessing the transient response of the facility for accidents and postulated accidents.</p>	<p>The RCS should not be designed to fail or operate in a mode that would prevent the RPS from performing its designed function, or prevent safe reactor shutdown. Confirm that the failure of any control system component or any auxiliary supporting system for control systems is within the bounds of those facility conditions analyzed in Chapter 13 of the SAR. The reviewer should also confirm that the safety analysis includes consideration of the effects of both control system action and inaction.</p>
24	The system and equipment are designed to assume a safe state on loss of electrical power. The applicant should describe the safe state for a loss of electrical power and those components that must change state for these conditions.	Confirm that the RCS is designed to assume a safe state on loss of electrical power (i.e., shutdown).
Calibration, Inspections, and Testing		
25	To maintain reliable and accurate performance, I&C systems undergo testing and calibration. Calibration, especially in analog systems, is used to address instrument drift, inaccuracies, and errors. The performance of analog systems can typically be predicted by the use of engineering models. Digital I&C systems are fundamentally different from analog I&C systems in that minor errors in design and	The subsystems and equipment of the RCS should be readily tested and capable of being accurately calibrated. Confirm that surveillance test and self-test features for a digital computer-based RCS address failure

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	<p>implementation can cause them to exhibit unexpected behavior. Inspection and testing are used to verify correct implementation and to validate desired functionality of the final product, in both analog and digital systems.</p> <p>One benefit of digital I&C systems is the use of self-testing, which is a test or series of tests performed by a device upon itself. Self-tests include on-line continuous self-diagnostics, equipment-initiated self-diagnostics, and operator-initiated self-diagnostics. Self-testing can be used to ensure reliable and accurate performance.</p>	<p>detection, self-test features (e.g., monitoring memory and memory reference integrity, using watch-dog timers or processors, monitoring communication channels, monitoring central processing unit status, and checking data integrity), and actions taken upon failure detection.</p>
26	<p>Surveillance tests are conducted specifically to confirm compliance with technical specification surveillance requirements.</p> <p>Provide a summary of the calibration, inspection, and testing (including self-tests and surveillance tests) to validate the desired functionality of the system.</p>	<p>Confirm that the description of the control elements, their drivers, and display or interlock components demonstrate that they The applicant should plan and discuss how all control elements, their driver and release devices, and display or interlock components will be calibrated, inspected, and tested periodically to ensure operability as analyzed in the SAR.</p>
27	<p>The applicant should plan and describe how all control elements, their driver and release devices, and display or interlock components will be calibrated, inspected, and tested periodically to ensure operability as analyzed in the SAR.</p>	<p>Conform that the The applicant should plans and discuss describes how all control elements, their driver and release devices, and display or interlock components will be calibrated, inspected, and tested periodically to ensure operability as analyzed in the SAR.</p>
Interlocks		
28	<p>Bypasses of interlocks should be under the direct control of the reactor operator and should be indicated in the control room. The need for, and potential consequences of bypassing interlocks should be carefully evaluated in the SAR.</p> <p>Describe the interlocks on such systems as the following, including provisions for testing and bypassing, if shown to be acceptable: transient rod drives; power level or reactor period recorders; startup neutron counter, gang operation of control elements; coolant flow or temperature conditions; beam ports, thermal column</p>	<p>Verify that the The applicant should describes in the SAR interlocks to limit personnel hazards or prevent damage to systems during the full range of normal operations and any provisions for testing and bypassing are indicated in the control room. Interlocks on such systems as the following should be described, including provisions for testing and</p>

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	access, irradiation chambers, pneumatic or hydraulic irradiators, high radiation areas; confinement or containment systems; experiment arrangements and beam lines; or special annunciator or information systems. Interaction with the RPS, if applicable, should be described.	bypassing, if shown to be acceptable; transient rod drives; power level or reactor period recorders; startup neutron counter; gang operation of control elements; coolant flow or temperature conditions; beam ports; thermal column access; irradiation chambers; pneumatic or hydraulic irradiators, high radiation areas; confinement or containment systems; experiment arrangements and beam lines; or special annunciator or information systems. Interaction with the RPS, if applicable, should be described.
29	<p>If applicable to the operation of an experimental facility or an experiment, the applicant should describe conditions in which experiment controls can interact with reactor controls.</p> <p>Direct interacting or interlocking with reactor controls may be justified if analyses of an experiment or experimental facility could show hazard to itself or the reactor. Any such automatic limiting devices should demonstrate that function of the RPS will not be compromised, or safe reactor shutdown will not be prevented (see Chapter 10, "Experimental Facilities and Utilization").</p>	<p>Verify that experimental facilities or experiments that contain interlocks will not compromise the function of the RCS, or safe reactor shutdown will not be compromised.</p> <p>Direct interacting or interlocking with reactor controls may be justified if analyses of an experiment or experimental facility could show hazard to itself or the reactor. Any such automatic limiting devices should demonstrate that function of the RPS will not be compromised, or safe reactor shutdown will not be prevented (see Chapter 10, "Experimental Facilities and Utilization").</p>
Independence		
30	If the RCS and RPS are designed to be independent systems, the issues of independence are physical, electrical, communications, and functional independence. The use of digital I&C add unique independence issues related to communication independence and functional independence.	Verify any physical, electrical, and communications independence and isolation between safety system functions and the control system that are relied upon in the accident analysis to ensure execution of safety

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31	<p>The SAR should address the separation and independence of the RCS and the RPS with consideration of the radiological risk of reactor operation, because these systems include common types of subsystems and components and similar functions. If the safety analysis in the SAR shows that safe reactor operation and safe shutdown would not be compromised by combining the two systems, they need not be separate, independent, or isolated from each other. The RPS design must be sufficient to provide for all isolation and independence from other reactor subsystems required by SAR analyses to avoid malfunctions or failures caused by the other systems. Isolation devices between the safety system and a non-safety system are classified as part of the safety system.</p>	<p>functions during and subsequent to any potential accident that requires a safety function. Verify that the protection system includes separation and isolation methods to protect the protection system from any malfunctions or failures caused by other systems, including the control system.</p> <p>If independence is assumed in the accident analysis and a digital computer system used in a safety system is connected to a digital computer system used in a non-safety system, verify that credible failures such as a logical or software malfunction of the non-safety system, would not affect the functions of the safety system.</p> <p>Verify that the SAR considered credible failures of the RCS and the possible need for redundancy to protect the protection system.</p>
Control of Access and Cyber Security		
32	<p>Access control, which includes physical and electronic control, applies to both analog and digital systems. Controls for physical access include provisions such as alarms and locks on panel doors, or administrative control of access to rooms. Access control includes both preventing unauthorized access but also allowing authorized access.</p> <p>Cyber security refers to preventative methods to protect information from attacks. It requires an understanding of potential information threats, such as viruses and other malicious code. The specific security requirements and subsequent review(s) are commensurate with the risk and magnitude of the harm resulting from unauthorized and inappropriate access, use, disclosure, disruption, or destruction of</p>	<p>Verify that the licensee has implemented measures throughout the software life-cycle to limit physical and electronic access to control system software and parameters to prevent changes by unauthorized personnel.</p>

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	<p>the digital safety system. Cyber security strategies include identity management, risk management and incident management.</p> <p>The objectives of access control and cyber security controls include protection of information and property from theft, corruption, or natural disaster, while allowing the information and property to remain accessible and productive to its intended users.</p> <p>Access control and cyber security must be addressed throughout the software life cycle. The framework for the waterfall life cycle model consists of the following phases:</p> <ol style="list-style-type: none"> 1. concepts, 2. requirements, 3. design, 4. implementation, 5. test, 6. installation, checkout, and acceptance testing, 7. operation, 8. maintenance, and 9. retirement. <p>Review of digital computer-based systems should consider controls that govern electronic access to system software and data. Provide a description of the controls used to address local and remote access. Examples of local access include access via maintenance equipment (e.g., workstations) and portable/removable storage devices. Examples of remote access include access via network connections. Special attention should be given to prevent inadvertent re-entry of outdated, superseded, or archived software versions into currently operating control equipment. Software and data updates should be verifiable by a version revision number and means for point-by-point validation of software.</p>	

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	<p>Network connections may be allowed to experimental controls provided proper communications barriers provide adequate confidence that the nonsafety portions cannot interfere with performance of the safety portion of the software or firmware. Provide a description of any network connections and those controls used to prevent attacks and protect information.</p> <p>For a combined RPS/RCS, the RCS shall meet the requirements for the RPS.</p>	
Use of Digital Systems		
33	<p>Digital I&C systems require additional design and qualification approaches than are typically employed for analog systems. The performance of analog systems can typically be predicted by the use of engineering models. These models can also be used to predict the regions over which an analog system exhibits continuous performance. The ability to analyze design using models based on physics principles and to use these models to establish a reasonable expectation of continuous performance over substantial ranges of input conditions are important factors in the qualification of analog systems design. These factors enable extensive use of type testing, acceptance testing, and inspection of design outputs in qualifying the design of analog systems and components. If the design process assures continuous behavior over a fixed range of inputs, and testing at a finite sample of input conditions in each of the continuous ranges demonstrates acceptable performance, performance at intermediate input values between the sampled test points can be inferred to be acceptable with a high degree of confidence.</p> <p>Digital I&C systems are fundamentally different from analog I&C systems in that minor errors in design and implementation can cause them to exhibit unexpected behavior. Consequently, the performance of digital systems over the entire range of input conditions cannot generally be inferred from testing at a sample of input conditions. Inspections, type testing, and acceptance testing of digital systems and components do not alone accomplish design qualification at high confidence levels. To address this issue, the staff's approach to the review of design qualification for</p>	<p>Confirm that control system failures cannot have an adverse effect on safety system functions and will not pose frequent challenges to the safety systems. An area of special emphasis for control systems is to assure that the control system design is consistent with the commitments for control system/safety system independence. Isolation of safety systems from control system failures should be addressed. Verify that applicants used a structured process in developing the control system software to minimize the potential for control system failures that could challenge safety systems. Perform a limited review of the functional requirements, the development process, the process implementation, and the design outputs of the control system software.</p> <p>Hardware and software for computerized systems should meet the guidelines of IEEE 7-4.3.2-1993, 'IEEE Standard Criteria for Digital</p>

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	<p>digital systems focuses to a large extent on confirming that the applicant/licensee employed a high-quality development process that incorporated disciplined specification and implementation of design requirements. Inspection and testing are used to verify correct implementation and to validate desired functionality of the final product, but confidence that isolated, discontinuous point failures will not occur derives from the discipline of the development process.</p> <p>Failures in the control system failures cannot have an adverse effect on safety system functions and will not pose frequent challenges to the safety systems. The design of the control system design should be consistent with the commitments for control system/safety system independence. Isolation of safety systems from control system failures should be addressed. The topics to be covered for the control system include identifying the functional requirements, the development process, the process implementation, and the design outputs.</p> <p>The control system software should be developed using a structured process similar to that applied to safety system software. The software development process should address potential security vulnerabilities in each phase of the software lifecycle.</p>	<p>Computers Systems in Safety Systems of Nuclear Power Generating Stations," and Regulatory Guide (RG) 1.152, "Criteria for Digital Computers in Safety Systems of Nuclear Power Plants," Revision 1, which is attached to Chapter 7 of the format and content guide as Appendix 7.1, and software should meet the guidelines of ANSI/ANS 10.4-1987, Guidelines for the Verification and Validation of Scientific and Engineering Computer Programs for the Nuclear Industry," that apply to non-power reactor systems.</p> <p>ANSI/ANS 15.15-1978, "Criteria for the Reactor Safety Systems of Research Reactors," and ANSI/ANS 15.20 (draft), "Criteria for the Control and Safety Systems for Research Reactors," are general guides for the design, implementation, and evaluation of I&C systems for non-power reactors and should be used where applicable. A digital control system developed by General Atomics has been reviewed by the stag found acceptable, and installed in several NRC-licensed TRIGA reactors (see Amendment No. 19 to Facility Operating License No. R-84, Docket No. 50-170 for the Armed Forces Radiobiology Research Institute TRIGA reactor, July 23, 1990, and Amendment No. 29 to Facility Operating License No. R-38, Docket No. 5-89 for the General Atomics TRIGA Mark I Reactor,</p>

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		<p>October 4, 1990). A digital control system developed by Atomic Energy Canada Limited has been reviewed by the staff, found acceptable, and installed in an NRC-licensed TRIGA reactor (see Amendment No. 30 to Facility Operating License No. R-2, Docket No. 50-5 for the Penn State Breazeale Reactor, August 6, 1991).</p>
<ul style="list-style-type: none"> • A description of the RCS requested in this section of the SAR why the system design is sufficient and suitable for performing the functions stated in the design bases. 	<p>The applicant should discuss the conclusions about capability and suitability of the RCS requested in Section 7.2.5. That is, the applicant should summarize in this section of the SAR why the system design is sufficient and suitable for performing the functions stated in the design bases.</p>	<p><i>Evaluation Findings</i></p> <p>This section of the SAR should contain sufficient information to support the following types of conclusions, which will be included in the staff's safety evaluation report:</p> <ul style="list-style-type: none"> • The applicant has analyzed the normal operating characteristics of the reactor facility, including thermal steady-state power levels, pulsing capability (if included), and the planned reactor uses. The applicant has also analyzed the functions of the reactor control system (RCS) and components designed to permit and support normal reactor operations, and confirms that the RCS and its subsystems and components will give all necessary information to the operator or to automatic devices to maintain planned control for the full

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		<p>range of normal reactor operations. I The components and devices of the RCS are designed to sense all parameters necessary for facility operation with acceptable accuracy and reliability, to transmit the information with high accuracy in a timely fashion, and control devices are designed for compatibility with the analyzed dynamic characteristics of the reactor.</p> <ul style="list-style-type: none"> • The applicant has ensured sufficient interlocks, redundancy, and diversity of subsystems to avoid total loss of operating information and control, to limit hazards to personnel, and to ensure compatibility among operating subsystems and components in the event of single isolated malfunctions of equipment. • The RCS was designed so that any single malfunction in its components, either analog or digital, would not prevent the reactor protection systems from performing necessary functions, or would not prevent safe shutdown of the reactor. • Discussions of testing, checking, and

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		<p>calibration provisions, and the bases of technical specifications including surveillance tests and intervals give reasonable confidence that the RCS will function as designed.</p> <ul style="list-style-type: none"> • The applicant has evaluated descriptions of planned interlocks or feedback controls from experimental apparatus to decrease postulated deleterious effects on the reactor. This review was coordinated with the effort for Chapters 10, "Experimental Facilities and Utilization," and 13, "Accident Analyses," and with Section 7.4, "Reactor Protection System." Furthermore, the design bases for such interlocks for future (not fully planned) experiments have been reviewed. The designs and design bases of the RCS give reasonable assurance that experiments will be planned and accomplished with due regard for protection of the reactor.