

Toshiba FPGA Based Safety-Related I&C System Acceptance Review Status

June 19, 2012

Agenda

INTRODUCTIONS

ACCEPTANCE REVIEW STATUS

ITEMS OF CONCERN FOR ACCEPTANCE

TOSHIBA PRESENTATION

PATH FORWARD

ACCEPTANCE REVIEW STATUS

- **Phase 0 Meeting, 2011**
- **Toshiba Submittal Letter November, 2011 ADAMS
ACCESSION # ML113530593**
- **Status : Incomplete – pending June 19 meeting**
- **Potential Issues for Acceptance:**
 - **Referencing unapproved topical report**
 - **Proprietary marking**
 - **Definition of product scope**
 - **Sufficiency of information**

ITEMS OF CONCERN

- Proprietary Information
 - NRR Office Instruction LIC-500 “Processing Requests for Reviews of TRs”, ML091520370 Public
 - Section 4.2.5 states “The minimum possible amount of information should be designated as proprietary.”
 - The staff finds that approximately > 80% of the TR is marked proprietary.

ITEMS OF CONCERN

- **Completeness of Scope**
 - NRR Office Instruction LIC-109 “Processing Requests for Reviews of TRs” ML091810088
 - Section 3.1.2 states “Determine if there are significant analyses or evaluations missing...”
 - Staff found that the TR does not fully support the application for a generic safety system. TR needs to include:
 - Clear list of qualified HW
 - Better definition of generic system limitations and interconnection of the qualified HW
 - Clear description or analysis of how referenced application specific documentation supports the broader system.

ITEMS OF CONCERN

- Referencing unapproved topical reports
 - NRR Office Instruction LIC-109 “Processing Requests for Reviews of TRs” ML091810088
 - Section 3.1.2 states “A licensee’s use of unapproved codes or TRs (or the use of codes and TRs outside the limitations imposed by the NRC staff) may be acceptable if the licensee or applicant has provided a full analysis to justify that the proposed use satisfies NRC regulations and is appropriately conservative.”
 - Staff found many direct references that appear to not be clearly substantiated with regard to generic application.
 - Ex. HW architecture description from PRM TR
 - Ex. EPRI –TR 107330 compliance matrix makes multiple references to PRM documents with no justification for applicability to the broader system.

ITEMS OF CONCERN

- Sufficiency of Information
 - NRR Office Instruction LIC-109 “Processing Requests for Reviews of TRs” ML091810088
 - Section 3.1.2 states “Determine if there are significant, obvious, problems with the information and analyses provided.”
 - Staff found no specific list of qualified components outside defined as the scope of this TR.
 - Staff found no description or analysis of the limitations on how these components may be used.

PATH FORWARD

- Options
 - Withdraw and resubmit updated topical report
 - Use ISG 6 Phase 0 meeting(s) to refine submittal
 - Staff can complete the acceptance review process
 - Non-Accept w/ opportunity to supplement
 - Toshiba has 13 days to resubmit per LIC-109
 - Non-Accept w/out opportunity to supplement
 - Toshiba would receive non-accept letter