

**Westinghouse Comments and Nuclear Regulatory Commission Staff Disposition of the Comments
on the Draft Safety Evaluation Report for WCAP-16096-P, Rev. 4, “Software Program Manual for Common Q Systems”**

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| SPM1 | 3.2.10 | 24 | “The director of the CEO is responsible and accountable for both technical and administrative aspects associated with the development and V&V tasks for each system assigned to the CEO.” | This is not consistent with Exhibit 2-1. This seems to imply that the design team and IV&V team report to the same director, which is not the case. Suggest changing “director” to “Vice president” | Agreed, changed the sentence to read: “The Vice president of the CEO is responsible and accountable for both technical and administrative aspects associated with the development and V&V tasks for each system assigned to the CEO.” |
| SPM2 | 3.2.13.1 | 29 | “ <ul style="list-style-type: none"> Confidentiality Vulnerability Integrity Vulnerability | This is a typographical error and should be changed to: “Confidentiality Vulnerability” “Integrity Vulnerability” | Agreed, added spaces. |
| SPM3 | 3.2.13.2 | 33 | “The NRC staff review of the Common Q review processes found them to be acceptable and compatible with IEEE Std 1028-2005, “IEEE Standard for Software Reviews.”” | This is a typographical error. It should say: “The NRC staff review of the Common Q review processes found them to be acceptable and compatible with IEEE Std 1028-1997, “IEEE Standard for Software Reviews.”” | Agree. Revise as suggested by WEC. Agreed, changed sentence. |
| SPM4 | 3.2.13.4 | 36 | “Several measures are taken during implementation to establish and maintain this IDI.” and the bulleted list that follows. | The information that is considered proprietary is the bulleted list of Westinghouse measures. This information is marked proprietary in the SPM for the following reasons: | Agreed, deleted the bulleted list and revised the sentence as follows: “Several measures are taken during implementation to establish and maintain this IDI.” |

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| | | | | <p>1. The information reveals the distinguishing aspects of a process or component, structure, tool, method, etc., and the prevention of its use by competitors of Westinghouse, without license from Westinghouse, gives Westinghouse a competitive economic advantage.</p> <p>2. The information, if used by a competitor, would reduce the competitor's expenditure of resources or improve the competitor's advantage in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.</p> <p>3. The information reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.</p> <p>Therefore, Westinghouse proposes the following wording: "There are several measures</p> | |

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| | | | | taken during the implementation to establish and maintain this IDI.” | |
| SPM5 | 3.2.13.4 | 36 | “Only dedicated computer workstations are used for code development activities.” | This is a typographical error. This item should be indented as part of the bulleted list. | Agreed, made this a bullet item as part of the preceding list. Deleted the item per the previous comment. |
| SPM6 | 4.2 | 38 | “Per letter dated August 25, 2010 (Reference 8), Westinghouse submitted WCAP-16097, “Common Qualified Platform Record of Changes” (Reference 9) for NRC review and approval.” | This is a typographical error. This should say: “Per letter dated August 25, 2010 (Reference 8), Westinghouse submitted WCAP-16097, Appendix 5, “Common Qualified Platform Record of Changes” (Reference 9) for NRC review and approval.” | Agreed, changed sentence. |
| SPM7 | Ref. | 40 | “Common Qualified Platform Record of Changes (WCAP-16097-P/NP), Revision 1 ADAMS Accession Nos. ML2115A215/ML2115A214.” | This is a typographical error. This should be: “Common Qualified Platform Record of Changes (WCAP-16097-P/NP, Appendix 5), Revision 1, ADAMS Accession Nos. ML2115A215/ML2115A214.” | Agreed, changed sentence. |