

September 10, 2015

MEMORANDUM TO: Anthony J. Mendiola, Chief
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Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager /RA/
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SUBJECT: SUMMARY OF JULY 14, 2015, PHASE-ZERO MEETING WITH
RESEARCH AND PRODUCTION CORPORATION RADIY

On July 14, 2015, staff from the U.S. Nuclear Regulatory Commission (NRC) met with representatives of Research and Production Corporation Radiy. This was a phase-zero meeting to discuss the Radiy digital instrumentation and control (DI&C) platform topical report (TR). Information related to the meeting, including presentations and attendees list, can be found in the Agencywide Documents Access and Management System (ADAMS) package ML15146A085.

In its opening remarks, the NRC staff explained this phase-zero meeting was intended to provide early insights to understand the Radiy DI&C platform and information to be included in its TR. Further, the NRC staff informed the Radiy representatives that at phase-zero meetings, no regulatory decisions are made; the meetings are just informative in nature. Finally, the NRC staff ensured that Radiy representatives understood that the time spent on the phase-zero meeting was fee-recoverable.

In its opening remarks, the Radiy representatives stated that Radiy was interested in bringing technology to the U.S. and appreciated the opportunity to come and discuss its TR with the NRC staff. The Radiy representatives stated that Radiy developed its TR using DI&C-Interim Staff Guidance-06 (ISG-06), "Task Working Group #6: Licensing Process Interim Staff Guidance" (ADAMS Accession No. ML110140103).

The NRC staff explained to the Radiy representatives that one of the lessons-learned from the ISG-06 pilot program was ISG-06 was better suited for license-amendment requests (LARs) and not necessarily for review of TRs. For example, there are several software planning documents identified in ISG-06 that are not relevant to generic platforms (e.g., software installation).

Also, the NRC staff explained the importance of clearly defining the TR scope. The NRC staff stated that if there was information in the report that was not part of the review scope for Radiy, then this information should not be part of the TR. In other words the TR should describe the specific modules and components to be reviewed as part of the platform evaluation.

During the meeting, the Radiy representatives made presentations on six different topic areas. The public versions of the presentations can be found in the ADAMS package cited above. The Topic 1 presentation provided an overview of Radiy and the TR, which led the NRC staff to perceive the platform as generic. Therefore, the NRC staff explained that the TR should discuss in more details the generic platform features and how application-specific logic would be implemented.

In the Topic 2 presentation, the NRC staff explained how the TR needs to be mapped to the NRC regulations and not to the International Electrotechnical Commission (IEC) Safety Integrity Level defined in IEC 61508. A question that arose during the Topic 4 presentation was whether smoke testing needed to be considered in the equipment qualification (EQ) program. After some discussion on the subject, the NRC staff agreed to confirm, as an action item, the need to consider smoke testing in the EQ program.

In the discussions on Topic 6 regarding the schedule and review, the NRC staff noted the proposed schedule was in line with the generic two-year review schedule for TRs. However, the NRC staff clarified the two-year review schedule was dependent on several factors. These included: 1) the quality of the submission; 2) the timeliness of the submission; 3) the number of requests for additional information that would be needed to support the review; and 4) LARs that could require the reviewer's time.

Continuing on the topic of review and schedules, the NRC staff informed Radiy representatives that the use of monthly status calls have been helpful in making reviews more efficient. The NRC staff explained that these calls would discuss the status of open items, review status, and schedule.

However, the details pertaining to regulatory decisions could not be discussed unless the calls were publicly noticed. It was agreed that once the TR was submitted monthly status calls would be scheduled.

Another way the NRC staff found to improve review efficiency was the use of a SharePoint site. Documents on this site give the NRC staff access to advanced copies of submissions, which could be auditable detailed supporting information or later docketed. Radiy representatives proposed the use of a File Transfer Protocol (FTP) server instead of a SharePoint site. The NRC staff agreed to look at whether it could use an FTP server.

A third recommendation the NRC staff made to improve efficiency was to hold a series of phase-zero meetings. During the ISG-06 pilot, the NRC staff found that multiple phase-zero meetings improved the efficiency of its review. Thus, it was suggested that consideration be given to having at least a second phase-zero meeting. An action from this meeting was to schedule a phase-zero call or meeting in November.

In closing the discussion on review and the meeting, the NRC staff explained the priority process for TRs, and informed Radiy representatives of the overall working queue at NRC. The NRC staff explained that LARs and other higher priority licensing work were given priority. TRs, although making the NRC process more efficient, were not the main focus to conduct our regulatory mission. Therefore, they were prioritized lower than LAR work.

Among TRs the NRC staff had a method to rank TRs individually against each other. The method was presented at a May 2012 meeting and would allow the staff to determine which TRs received what priority.

The action items from the meeting were:

- 1) Radiy will consider linking the subsets of documents identified in ISG-06 to its key documents.
- 2) The NRC staff will check on whether smoke testing is needed to be considered in the EQ program.
- 3) Once the TR is submitted, monthly status calls will be established to discuss administrative details of the review.
- 4) Radiy and the NRC staff will look into the use of a SharePoint site or a FTP server to provide advanced copies of documents to be submitted and allow the NRC staff access to supporting information.
- 5) A future phase-zero meeting or call will be scheduled, potentially in the November 2015 time frame.

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