

Vogle PEmails

From: Yox, Michael <MYOX@SOUTHERNCO.COM>
Sent: Monday, October 10, 2016 1:29 PM
To: Patel, Chandu
Cc: Willis, Frederick H.; Roberts, Kelli Anne; Fuller, Justin; Hirmanpour, Bob
Subject: [External_Sender] 2016-10-06 Digital I&C Strategy Meeting feedback (NRC/SNC/SCANA)

Mr. Patel,

The following notes are offered for NRC review and feedback. The notes reflect the licensee's perspective on the discussion and, subject to NRC review or feedback to the contrary, would be appropriate for capturing on the public docket.

Kind regards,

Michael Yox



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During the open portion of the [October 6, 2016](#) Digital Test Strategy (DTS) meeting, VCS General Manager (Dave Lavigne) answered the NRC questions provided prior to the meeting. WEC ITP (Dana Hyde) [provided](#) a more detailed DTS presentation during the closed portion. Staff was aligned with one another in their message that they did not have any concerns with the high-level DTS approach. Multiple staff members expressed alignment with the high-level DTS. There were three major takeaways:

What NRC staff is looking for (primarily from Terry Jackson's perspective)—The staff has no issues with the high-level DTS approach and agrees that it meets [SNC's](#) current licensing basis. What is most important to [NRC](#) is that testing verifies all system functions and interfaces, which is what [NRC](#) will be looking for when they review the details/implementation of [SNC's](#) high-level digital test strategy. [NRC](#) staff expects to see field verification to the extent practical but understands there may be instances (e.g. potential equipment damage) when that would not be considered practical.

Path forward for NRC's Inspection Guidance (Kerri Kavanagh) —[NRC](#) expects to revise IPs for test conduct (not program IP) because inspectors will need guidance on how to inspect procedure steps that require test personnel to validate pre-installation test results. Different inspectors would interpret this step differently, and IP guidance is needed to ensure consistency. To develop this guidance, [Mrs. Kavanagh](#) needs support from the NRC technical staff to help define what an acceptable approach is.

Test Package Documentation (Paul Pieringer and David Curtis)—Inspectors need to understand how everything from signal input to signal output has been tested during some phase of testing. If licensees can provide a roadmap for this verification through the different levels and clearly show how everything is tested, then few issues/problems are expected. The difficulty will be if an inspector has to piece the story together by going to references upon references. [The approach is acceptable](#) as long as all of the pieces are there, but that process would mean different things to

different inspectors so clear inspection guidance [is needed](#). Understanding the documentation that will be available is a critical element of the inspection strategy.

Actions Taken

1. NRC has the action to identify an appropriate inspection approach and develop IP guidance. (Licensees requested an opportunity to review/comment.)
2. NRC agreed to consider fitting in an inspection of the available DTS documentation, in conjunction with the 2 feedwater pre-operational test procedures that are available, during VEGP/VCS's upcoming January/February ITP administrative manual inspections.
3. Licensees will work with [the](#) respective [NRC](#) PMs to make sure the appropriate NRO staff have access to the site where DTS documents will be posted.

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