Office for Nuclear Regulation

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WESTINGHOUSE AP1000® GENERIC DESIGN ASSESSMENT GDA ISSUE DAS – ADEQUACY OF SAFETY CASE GI-AP1000-CI-01 F9J-G-CB*\$

Technical Area		CONTROL AND INSTRUMENTATION					
Related Technical Areas		None					
GDA Issue Reference	GI-AP1000-CI-01		GDA Issue Action Reference	GI-AP1000-CI-01.A1			
GDA Issue	Westinghouse has proposed design changes to the DAS secondary protection system, as a result the DAS design is not complete and this has lead to the absence of safety case argumentation and evidence to substantiate the DAS design.						
	Westinghouse has provided an initial basis of safety case (BSC) for the DAS and ONR's assessment has shown that this broadly aligns with our expectations. However, Westinghouse needs to respond to ONR's observations on the BSC, progress the detailed design, complete the safety case, provide the evidence identified in the safety case and introduce the design change proposal.						
	Annex 5, and also T1	guidance, see T15.TO2.14, T15.TO2.16, T15.TO2.18 to 26 and T15.TO2.54 nd also T16.TO1.03 and its associated TO2s, T16.TO1.04, T16.TO2.17, a in Annex 6 of ONR C&I Assessment Report No. 11/006 (draft).					
GDA Issue Action	Westinghouse to formally introduce the change to the architecture and technology of the DAS via the design change process (DCP). The revised DAS has to be formally introduced and the safety documentation amended accordingly. With agreement from the Regulator this action may be completed by alternative means.						

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Technical Area		CONTROL AND INSTRUMENTATION					
Related Technical Areas		None					
GDA Issue Reference	GI-AP1000-CI-01		GDA Issue Action Reference	GI-AP1000-CI-01.A2			
Reference GDA Issue Action	Westinghouse to provide the basis of safety case for the completed design of the DAS. The form and content of the BSC for the completed design is indicated below, the interim BSCs should also record in principle the methodology by which the missing design information and substantiation will be included to demonstrate the adequacy of the DAS and to justify that sufficient information will be available in a timely fashion for assessment by ONR. The BSC should start by identifying the safety principles and standards (i.e. company, national and international) that WEC has adopted for the equipment / system. The BSC should identify the arguments for assigning safety functions and performance requirements to the equipment / system in compliance with the categorisation and classification principles and standards. The BSC demonstration of compliance with SAPs and standards needs to show that the development practices are consistent with modern standards and the declared practices (e.g. in procedures) have been adhered to. Compensatory measures are required to address gaps in the compliance demonstration. The BSC should describe the AP1000 C&I project QA arrangements and certification (e.g. to ISO 9001). The BSC should include a clear description of the interface to the equipment / system supplier (and any other suppliers) and outline their QA arrangements and their adequacy. The BSC should describe the equipment / system, and identify the major elements (such as sensors, input/output and logic cards, and actuators) and include the demonstration of						
	integration process environmental qualific	including ation.	the intended factory	BSC should address the system and commissioning tests, and e construction and commissioning			
	activities, and identify when the evidence related to these activities will be produced. For completeness, the BSC should also specify through life operating and maintenance requirements including the minimum equipment availability requirements, and the scope and frequency of any proof testing.						
	The BSC should identify any supporting analysis such as hazards analysis, FM						

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CONTROL AND INSTRUMENTATION

ical Areas			None			
G	I-AP1000-CI-01	GDA Issue Act	ion	GI-AP1000-CI-01.A	2	
		Reference				

reliability analysis, environmental qualification, and link them to the claims made in the safety demonstration. The BSC should identify the use of defensive design and fault revealing techniques.

The BSC should identify the pedigree of any COTS and pre-developed components and provide a demonstration of the adequacy of the development arrangements. For older components the safety argument might involve use of proven in use arguments and testing rather than a production excellence argument. In either case any compensatory measures undertaken to address shortfalls should be identified in the safety demonstration.

The BSC should demonstrate how the design and implementation of the equipment using complex. / programmable, components, e.g. microprocessors, ASICs, and Field Programmable Gate Arrays complies with relevant WEC safety principles and standards. Given the programmable nature of such complex devices, SAP ESS.27 a special case procedure for the demonstration of safety that involves the presentation of an argument of production excellence and implementation of independent confidence building measures. Where complex hardware is involved, the BSC should identify how the safety demonstration conforms to party assessment.

The BSC should include a plan that shows the forward activities, and production of related safety case documentation and evidence. Interim BSCs should be provided, particularly for large complex systems. A BSC for the completed design¹ should be submitted as soon as reasonably practicable before permission to commence nuclear site construction is sought. A BSC for instal lation and commissioning would be expected before equipment is delivered to site.

Notes

- 1. Completed design The design is complete at the point where the:
 - requirements, specifications, and implementation details (e.g. software coding and circuit diagrams etc.) have been completed;
 - production verification and validation activities (i.e. prior to delivery to site) have been completed;
 - prototype equipment has been produced and subject to performance and qualification testing:

With agreement from the Regulator this action may be completed by alternative means.

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