	Procedure	Nuclear Engineering
-----------------------------------------------------------------------------------	------------------	----------------------------

Title: **Control of the Safety Analysis Report**

Document Identifier: **240-119744497**

Alternative Reference Number: **KAA-697**

Area of Applicability: **Nuclear Engineering**



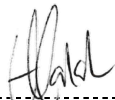
Functional Area: **Safety Case Group**

Revision: **2**

Total Pages: **19**

Next Review Date: **November 2023**

Disclosure Classification: **Controlled Disclosure**

Compiled by	Functional Responsibility	Authorized by
		
A Rijnsburger Senior Advisor Safety Case Group	M Hermanus Manager Koeberg Safety Case Group	D Malale Acting - Koeberg Integrated Plant Design Manager
Date: 2020-11-30	Date: 2020-11-30	Date: 30 November 2020

Nuclear Additional Classification Information

Business Level: **3**

Working Document: **3**

Importance Classification: **SR (S11317)**

NNR Approval: **No**

Safety Committee Approval: **No**

ALARA Review: **No**

Functional Control Area: **Safety Case Group**

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1. Introduction

Koeberg Nuclear Power Station's Safety Analysis Report is part of the plant's licence to operate and is updated continually. This document guides the update process.

2. Supporting Clauses

2.1 Scope

The change process for all major revisions, minor revisions, editorial changes and temporary changes to the Safety Analysis Report, including the review process, authorisation and records.

2.1.1 Purpose

To describe the process and establish the responsibilities for the production and approval of changes to Koeberg's Safety Analysis Report.

2.1.2 Applicability

Applicable to all changes to the Safety Analysis Report.

This document shall apply throughout Nuclear Engineering and Koeberg Nuclear Power Station.

This document shall apply throughout Eskom Holdings Limited Divisions.

2.1.3 Effective date

This document is effective from the authorisation date.

2.2 Normative/Informative References

2.2.1 Normative

- [1] ISO 9001 Quality Management Systems
- [2] 238-8: Nuclear Safety and Quality Manual
- [3] 238-18: Nuclear Division, Nuclear Licensing Requirements Manual
- [4] 286-6: KOU Documentation and Records Management Standard
- [5] 331-3: Nuclear Engineering Documentation and Records Management Work Instruction
- [6] 36-260: Safety Document Review Group – Koeberg Procedure
- [7] KAA-500: The Process for Controlled Procedures
- [8] KSA-011: The Requirements for Controlled Documents
- [9] KSA-038: Requirements for Quality Records
- [10] LD-1091: Requirements on Licensees of Nuclear Installations Regarding Risk Assessment and Compliance with the Safety Criteria of the NNR

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[11] NEI 98-03: Guidelines for Updating Final Safety Analysis Reports

[12] US NRC RG 1.181: Content of the Updated Final Safety Analysis Report in accordance with 10 CFR 50.71(e)

2.2.2 Informative

[13] 331-85: Design Documentation Change Process (KAA-560)

[14] KAA-709: Process for Performing Safety Screenings, Safety Evaluations, Safety Justifications and Safety Cases

2.3 Definitions

2.3.1 SAR Update Request – A request motivation and justification for a change to the SAR. An Update Request is referred to in a Change Notice, but it does not become part of the Change Notice package. An Update Request is given a 4-digit serial number in the form UR-nnnn by the Safety Case Group.

2.3.2 SAR Change Notice – Notification of a change to the SAR. A change notice may be issued for a permanent or a temporary change. Permanent changes are numbered CN-nnn. Temporary changes are numbered TCN-nnn and include an expiry condition or date. A CN, when authorised, is reflected in the SAR.

2.3.3 SAR Editorial Changes – Refer to KAA-709.

2.3.4 SAR Major Revision – A complete revision or re-issue of the SAR. Typically this is run as a project following or coincident with the Periodic Safety Review (PSR).

The numbering system for an SAR major revision is: Rev “X”, where X = 1, 2, 3, 4, etc.

2.3.5 SAR Minor Revision – A partial revision of the SAR issued between major revisions. These revisions incorporate individual SAR change notices.

The decision to issue a Minor Revision is made typically on the basis of the accumulation of a number of Change Notices or particularly significant changes to a section.

The numbering system for an SAR minor revision is: Rev “Xy”, where X is the number of the currently authorised major revision and y = a, b, c, etc. for the minor revision.

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2.4 Abbreviations

Abbreviation	Explanation
CN	Change Notice
EDF	Electricité de France
GM(NE)	General Manager Nuclear Engineering
IPD-K	Integrated Plant Design – Koeberg
NNR	National Nuclear Regulator
NSA	Nuclear Safety Assurance
PRA	Probabilistic Risk Assessment
PSR	Periodic Safety Review
SAR	Safety Analysis Report
SCG	Safety Case Group
SDRG	Safety Documentation Review Group
TCN	Temporary Change Notice
TD & RM	Technical Documentation & Records Management
UR	Update Request

2.5 Roles and Responsibilities

2.5.1 The General Manager Nuclear Engineering is responsible for the SAR.

2.5.2 The Safety Case Group (SCG) is responsible for the co-ordination and control of changes to the SAR.

2.5.3 The SCG shall keep the SAR format in line with the EDF SAR format to the extent practicable.

2.5.4 The SCG Manager shall authorise persons to review and control SAR change documents.

2.5.5 The SAR update request (UR) originator:

If the UR is intended to report a problem encountered in the SAR then the problem has to be described on the form and supporting documents must be specified. A change proposal can also be made.

If the SAR change is required to implement a change in regulations, design, practice, safety analysis, accident analysis etc. then the UR must comprehensively deal with the entire impact on the SAR. Each affected paragraph must be identified and the required change must be described with mark-ups of the affected SAR chapters. The reason for each change must be evident, and each change must have a justification that proves its safety, supported by an approved Safety Screening, Safety Evaluation and Safety Justification, as applicable.

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2.5.6 The CN Compiler: The compiler is responsible for compiling change notice packages for updating the SAR with the proposed changes. The compiler must be an authorised Safety Screener or Evaluator, or an SAR Change Authorised Person.

2.5.7 The CN Reviewer: The reviewer must verify the completeness and correctness of the proposed changes. The reviewer must be an authorised Safety Evaluator or an SAR Change Authorised Person.

2.5.8 Other responsibilities are defined in the relevant work-flow responsibility matrices (Appendices A and B).

2.6 Process for Monitoring

It is the responsibility of SCG, as per Roles and Responsibilities in 2.5 above, to ensure that this document used for the Control of the Safety Analysis Report stays relevant with current world practice. This will be achieved either by self-assessments performed or during the cyclic document review process.

2.7 Related/Supporting Documents

Appendix C – SAR Update Request (UR) Form

Appendix D – SAR Change Notice (CN) Form

Appendix E – SAR Change Notice Index Form

Appendix F – SAR Publication Checklist

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3. Procedure

- 3.1 Follow the process described in Appendix A for change notices and minor revisions.
- 3.2 Follow the process in Appendix B for major revisions.
- 3.3 Appendix C shall be used to record an SAR update request (this includes special projects like LTO).
- 3.4 URs are temporary working documents that are no longer necessary once the corresponding CN has been approved. Only one CN will be required for special projects where there are multiple changes.
- 3.5 Appendix D shall be used to record a summary of the actual SAR change or update.
- 3.6 Temporary changes may be implemented without incorporation into the SAR on a case-by-case basis, based on an evaluation of the importance of each temporary change (from a nuclear safety point of view) and on the period of validity.
- 3.7 Changes are marked in the SAR by inserting "CN-xxx" alongside changed text. The number of the most recent CN on a page since the last minor or major change appears in the cell to the left of the Revision Xy number.
- 3.8 Approved CNs that will be included into the SAR in the next minor or major revision are saved with the SAR files in the SAR folder on the G \ drive - "SAR Main Database" under G:\Nuclear Engineering\Safety Case Group\SAR Group\ Administration\Databases.
- 3.9 The justification for the SAR change needs to be assessed from a safety perspective. This may be done through a Safety Screening, Safety Evaluation and Safety Justification as applicable by the person(s) responsible for changing the SAR.

4. Acceptance

This document has been seen and accepted by:

Name	Designation
Mvuseleli Hermanus	Manager Safety Case Group
Ditsietsi Malale	Acting Manager IPD-K

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5. Revisions

Date	Rev.	Compiler	Remarks
November 2020	2	A.J. Rijnsburger	Included Self- assessment findings (SE 38337-003, 005 and 006 GA) Safety Screening S11317 (240-119744497 KAA-697)
November 2018	1	C Pretorius	Full review, Revision of old format Koeberg document KAA-697 rev. 6 to rev. 1 in the new format and numbering system: 240-119744497. Included close out QA finding CR 91171 – CA.
October 2018	0	C Pretorius	First Issue Draft

6. Development Team

The following people were involved in the development of this document:

- Arij Rijnsburger
- Sandra Morgan
- Cate Pretorius

7. Acknowledgements

N/A

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Appendix A– Work Flow Responsibility Matrix: SAR Change Notice and Minor Revision Process

WORK FLOW RESPONSIBILITY MATRIX					SAR CHANGE NOTICE AND MINOR REVISION PROCESS											
<div>R – Responsible</div> <div>A – Approve</div> <div>F – File</div> <div>• – Outside Matrix Scope</div> <div>Y/N or N/Y – Decision</div> <div>C – Concur</div> <div>I – Informed</div> <div>S – Service</div> <div>[] – Mandatory Requirement</div> <div>() – As Appropriate/Required</div> <div>Flow Path:</div> <div><div></div><div></div></div> <div>Main Flow</div> <div>Secondary Flow</div>	ORGANISATION / FUNCTION												NOTES & REFERENCES			
	Update Request Originator	Update Request Reviewer	SAR change authorised person or safety screener and evaluator	Integrated Plant Design (Koeberg)	SDRG		Nuclear Licensing		GM(NE)	NNR	Configuration Management	TD & RM				
ACTIVITIES	1	2	3	4	5	6	7	8	9	10	11	12				
1. Complete the first page of the SAR Update Request (UR) form.	[R]	[A]											Appendix C. Supply the complete description and justification for the change request. The chapter, section and sub-section to be updated shall be listed on the UR form.			
2. Receive the UR form and check the contents of the package.		(I)	[R]										Issue a UR number and sign the form if all relevant information is supplied, e.g. design including the associated safety screening and evaluation as applicable.			
3. Is the UR package complete?			Y/N										Request the missing information from the originator.			
4. Review the UR.			[R]	(S)												
5. SAR Change Notice (CN) required?			Y/N										Where only editorial changes are required, the UR can be incorporated into the next SAR major revision.			
6. The group manager approves cancellation, postponement or incorporation into next major revision.				[A]									Return copy of the cancelled UR to the originator, or incorporate the UR in accordance with Appendix B.			
7. Prepare and complete CN.			[R]	(S)									Appendix D. Reviewed and approved by authorised staff.			
8. Forward CN to SDRG for review and approval.			[R]													
9. SDRG review and approval.					[A]											
10. CN approved?			[I]		N/Y								SDRG approval.			
11. Return to appropriate stage of process.													To resolve SDRG / NNR comments and resubmit CN. Return to activity 7.			
12. Return to the SCG document custodian			[R]										Perform an editorial review of the changed document.			

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WORK FLOW RESPONSIBILITY MATRIX							SAR CHANGE NOTICE AND MINOR REVISION PROCESS							
<div>R – Responsible</div> <div>A – Approve</div> <div>F – File</div> <div>• – Outside Matrix Scope</div> <div>Y/N or N/Y – Decision</div> <div>C – Concur</div> <div>I – Informed</div> <div>S – Service</div> <div>[] – Mandatory Requirement</div> <div>() – As Appropriate/Required</div> <div>Flow Path:</div> <div><div></div><div></div></div> <div>Main Flow</div> <div>Secondary Flow</div>	ORGANISATION / FUNCTION												NOTES & REFERENCES	
	Update Request Originator	Update Request Reviewer	SAR change authorised person or safety screener and evaluator	Integrated Plant Design (Koeberg)	SDRG		Nuclear Licensing		GM(NE)	NNR	Configuration Management	TD & RM		
	1	2	3	4	5	6	7	8	9	10	11	12		
	13. Forward CN to NNR for approval.													
	14. CN approved?													NNR approval.
	15. Check that the revisions of the SAR pages have not been affected by an overlapping change.													If there is an overlap, integrate the pages and inform the approval bodies.
	16. Obtain GM (NE) authorisation for change notice.													Appendix D (Authorisation) after field implementation.
	17. Process CN.													In accordance with Appendix F. Drawing changes in accordance with KAA-560.
	18. Forward SAR revision to SDRG for review/approval.													
	19. Issue SAR revision.													In accordance with Appendix H. Distribution matrix must be verified and updated before controlled copy distribution. Configuration Management distributes in accordance with distribution matrix to the Control Copy Holder.
	20. SAR Storage													TD & RM keeps the SAR master CD.
	21. Keep CN as a record.													Update the “SAR Main Database” under G:\Nuclear Engineering\Safety Case Group\SAR Group\Administration\Databases.

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Appendix B– Work Flow Responsibility Matrix: SAR Major Revision Process

WORK FLOW RESPONSIBILITY MATRIX						SAR MAJOR REVISION PROCESS												
<div>R – Responsible</div> <div>A – Approve</div> <div>F – File</div> <div>• – Outside Matrix Scope</div> <div>Y/N or N/Y – Decision</div> <div>C – Concur</div> <div>I – Informed</div> <div>S – Service</div> <div>[] – Mandatory Requirement</div> <div>() – As Appropriate/Required</div> <div>Flow Path:</div> <div><div></div><div></div></div> <div>Main Flow</div> <div>Secondary Flow</div>	ORGANISATION / FUNCTION												NOTES & REFERENCES					
	GM(NE)	Integrated Plant Design (Koeberg)	Project leader for SAR revision	Preparers	Reviewers	Station departments and groups	KORC	SDRG	Nuclear Licensing	NNR	Configuration Management	TD & RM						
	1	2	3	4	5	6	7	8	9	10	11	12						
	1. Inform personnel of next revision date.		[R]		[I]	[I]	[I]	[I]	[I]	[I]	[I]			[S]	In accordance with Appendix C.			
	2. Allocate cut-off for inclusion in next revision.		[R]		[I]	[I]	[I]	[I]	[I]	[I]	[I]			[S]	In accordance with Appendix C.			
	3. Obtain project leader for SAR revision.		[R]	[I]														
	4. Provide copies of relevant change notices to project leader.		[R]	[I]								(I)						
	5. Provide copies of new safety issues to project leader.		[R]	[I]								(I)			From PRA safety analyses, correspondence, EDF, etc.			
	6. Prepare change packages and process in Appendix D.			[R]														
	7. Compile SAR major revision package.		(S)	[R]	(S)	(S)	(S)											
	8. Incorporate CNs into SAR major revision.			[R]														
	9. Forward SAR major revision to SDRG for review/approval.		[R]												– Including:Appendix D (of changed SAR files) – SAR major revision (Draft)			
	10. SDRG review/approval of SAR major revision.									[A]								
	11. SAR major revision approved?		[I]							N/Y								
12. Return to appropriate stage of process.		[R]																
13. Return to the SCG document custodian		[R]											Perform an editorial review of the changed document.					

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WORK FLOW RESPONSIBILITY MATRIX						SAR MAJOR REVISION PROCESS											
<div>R – Responsible</div> <div>A – Approve</div> <div>F – File</div> <div>• – Outside Matrix Scope</div> <div>Y/N or N/Y – Decision</div> <div>C – Concur</div> <div>I – Informed</div> <div>S – Service</div> <div>[] – Mandatory Requirement</div> <div>() – As Appropriate/Required</div> <div>Flow Path:</div> <div><div></div><div></div></div> <div>Main Flow</div> <div>Secondary Flow</div>	ORGANISATION / FUNCTION												NOTES & REFERENCES				
	GM(NE)	Integrated Plant Design (Koeberg)	Project leader for SAR revision	Preparers	Reviewers	Station departments and groups	KORC	SDRG	Nuclear Licensing	NNR	Configuration Management	TD & RM					
	1	2	3	4	5	6	7	8	9	10	11	12					
	14. Forward SAR revision to NNR for approval.									[R]	[A]						
	15. SAR major revision approved?		[I]							N/Y							
	16. Obtain GM (NE) signature to authorise SAR revision master electronic copy.	[A]	[R]														
	17. Review any Change Notices issued since cut-off date.		[R]														
	18. Revise Change Notices to match SAR Revision and revise index.		[R]														
	19. Issue SAR revision. This includes the CD and submittal to Configuration Management for controlled distribution and SAR stakeholder's notification.		[R]											[•]			
	20. SAR Storage																
	21. Complete change notice forms.		[R]														
	22. Transfer master records to TD & RM.		[F]											[•]			
	23. Keep CN as a record		[R]														


Update the "SAR Main Database" under G:\Nuclear Engineering \ Safety Case Group \ SAR Group\ Administration\Databases.

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Appendix C – SAR Update Request (UR) Form*(Available On G:\SAR\SAR Update Request Form)*

		SAR UPDATE REQUEST		Revision: 1	Page: 1 of 2
				Associated Procedure: KAA-709	
SAR Update Request No: UR nnnn		SAR Revision Reviewed: Rev.5b		Date UR Raised: 20yy-mm-dd	
Originator name:		Originator signature:		Reviewer name:	
Reviewer signature:					
Request originated as a result of: (delete whichever is not applicable)	SAR ANOMALY <input type="checkbox"/> Y <input type="checkbox"/> N	OPERATING PRACTICE CHANGE <input type="checkbox"/> Y <input type="checkbox"/> N	DESIGN CHANGE <input type="checkbox"/> Y <input type="checkbox"/> N	OTHER (specify in description) <input type="checkbox"/> Y <input type="checkbox"/> N	
Source documents: (List reference number(s) and title(s). Also list applicable safety screening, safety evaluation, safety justification, safety case, etc)					
Proposed change: Title: Description:					
Item No:	SAR Section affected:	Description of change:			
1					
2					
3					
4					
5					
Justification: per item number. Also state why the change is safe, not just why it is required. Multiple items may be grouped, e.g. items 2-10. 1) ***					

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Appendix D – SAR Change Notice (CN) Form

SAR CHANGE NOTICE Page___ of___

CHANGE NO: CN-XXX APPLICABLE TO UNIT:

REV.: X

PART	CHAPTER	SECTION	HEADING	Authorised SAR Page No.	Changed SAR Page No.	UR No.
X	X	X	X	X		XXXX
◆						
X	X	X	X	X		XXXX
◆ X						
X	X	X	X	X		XXXX
◆ X						
X	X	X	X	X		XXXX
◆ X						

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SAR Change Notice (CN) Form
... continued ...**SAR CHANGE NOTICE** Page ____ of ____**CHANGE NO: CN-XXX APPLICABLE TO UNIT:****REV.: X****2. Change Reason:**

The SAR updates relate to

3. Justification for Change:

Safety Screening : SXXXX-XXXX

Safety Evaluation : EXXXX-XXXX

Safety Justification : JXXXX-XXXX

	NAME	DEPARTMENT / DESIGNATION	SIGNATURE	DATE
COMPILED				
REVIEWED		KOEBERG SAFETY CASE GROUP		
APPROVED		KOEBERG SAFETY CASE GROUP		
APPROVED		SDRG		

NNR Approval?**Yes/No****K_____ -E****k N**

AUTHORISED		NUCLEAR ENGINEERING		
------------	--	------------------------	--	--

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Appendix E – SAR Change Notice Index Form

SAR CHANGE NOTICE INDEX	Vol: _____	Rev: _____
--------------------------------	-------------------	-------------------

No. Part, Chapter, Section, Subject,

Status, Revision

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Appendix F– SAR Publication Checklist

Nº	Action	Initial Check (✓)	Final Check (✓)
1	Chapter, Section, Subsection files		
1.1	Word file(s) updated		
1.2	Overlapping changes resolved		
1.3	Revision marks inserted		
1.4	Revision number changed		
1.5	Tracked changes accepted , rejected		
1.6	Electronic comparison		
1.8	Revision History updated		
1.9	Hyperlinks checked and tested		
1.10	Previous revision moved to 'Historic'		
1.11	New Revision Word chapters moved to "SAR Working Folder" in "SAR Group" folder on the G drive		
2	Acrobat PDF		
2.1	PDF created		
2.2	Hyperlinks tested		
2.3	New PDF moved to G:\SAR		
2.4	PDX Search Engine updated		
3	Authorised Change Notice		
3.1	Signatories names, dates inserted		
3.2	PDF created		
3.3	PDF hyperlinks inserted		
3.4	PDF hyperlinks tested		
3.5	PDF moved to G:\SAR		
4	Figures		
4.1	Figures duly authorised		
4.2	Figure PDF created		
4.3	Figure moved to G:\SAR		
4.4	Hyperlink(s) to Figure(s) tested		
5	Compact Disk		
5.1	G:\SAR Contents Copied To CD		
5.2	CD labelled		
5.3	CD submitted to TD&RM		
5.4	Verify controlled copy holders on the distribution checklist		
5.5	Records submitted to TD&RM		

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Appendix H – Controlled Copy Holders Distribution List

CCH	HOLDER	Revision # CD	Revision # LAN	Notes
89	NNR (Centurion)	X	-	
107	NNR (Site office – Table View)	X	-	
13	ECC/TSC	X	X	
167	AECC (Bellville)	X	-	(1)
36	MAB (Satellite station - Library)	X	X	
98	RFE	X	X	
118	OPG	X	X	
186	EDF	X	-	
186	EDF Emergency Centre, Paris	X	-	
	Areva	X		(2)
	Nuclear Structural Engineering Pty Ltd	X	-	
	Lesedi Nuclear Services	X		
	Westinghouse Services (Fuel)	X	-	(2)
	Westinghouse (Belgium)	X	-	(2)
	Westinghouse (South Africa)	X		

CD – Compact Disk**LAN** – Local Area Network**CCH** – Controlled Copy Holder

Notes:

(1) Via ECC/TSC

(2) If required, via RFE

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