ELSA-2-5

Proposal for Rulemaking Process of Electrical Safety Regulation for Fuel Cell Vehicle High Voltage Systems

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- Introduction
- Regulation Rulemaking Process
 - □ Process Introduction
 - Regulation Coverage Analysis Method
 - □ Regulation Completeness Analysis Method
- Conclusion

Introduction

Background

- Regulations are needed for ensuring safe operation of FCV high voltage system
 - To prevent fire, explosion, human injuries
- Complex system behavior makes it difficult to generate regulation which can prevent all possible accidents
 - A methodology to check the coverage and completeness of the regulation items is needed

Objective

- Propose a rulemaking process of electrical safety regulation for fuel cell vehicle high voltage systems
 - Capable of checking coverage, completeness
 - Capable of suggesting new regulations from existing regulations

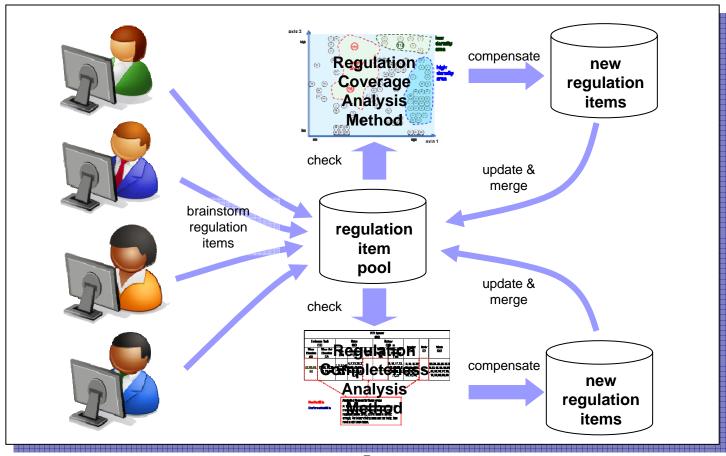
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Process Introduction

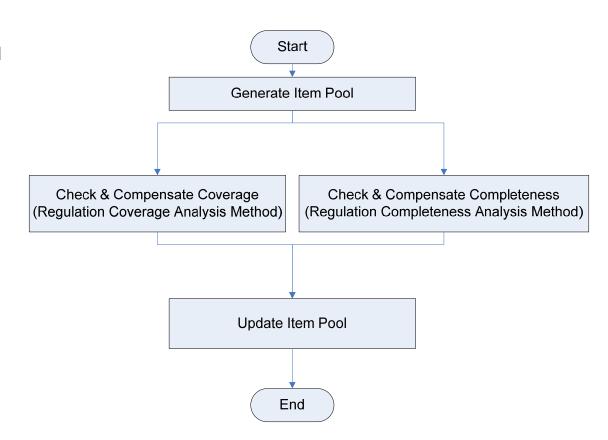
Concept

- ☐ Generate requirement list by brain storming and update the requirements systematically
 - Use Regulation Coverage Analysis Method to check and improve coverage of regulated areas
 - Use Regulation Completeness Analysis Method to check and improve completeness of requirements





- Flow chart
 - Generate new requirement item pool
 - Make an item pool that stores requirement items
 - Generate requirement items by brainstorming
 - □ Check & compensate coverage
 - Use proposed "Regulation Coverage Analysis Method"
 - ☐ Check & compensate completeness
 - Use proposed "Regulation Completeness Analysis Method"
 - Update requirement item pool
 - Update item pool by adding new requirement items



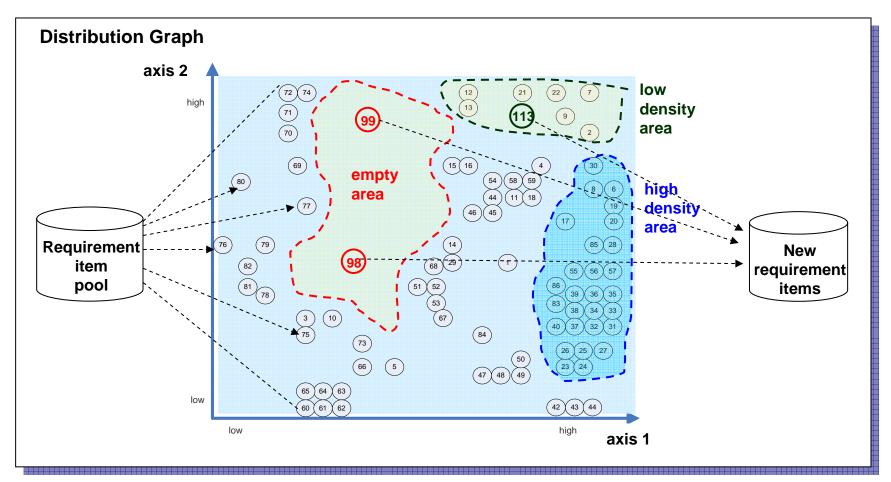
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Regulation Coverage Analysis Method

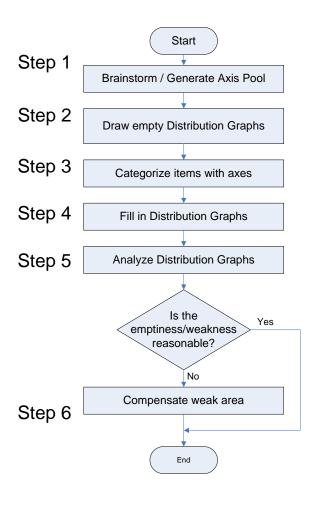
Concept

 Distribute requirement items onto "Distribution Graph" to check coverage and compensate low density areas



Regulation Coverage Analysis Method (Cont'd)

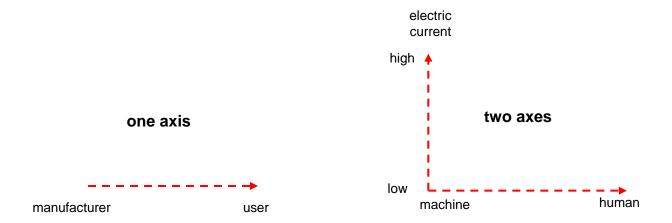
Flowchart

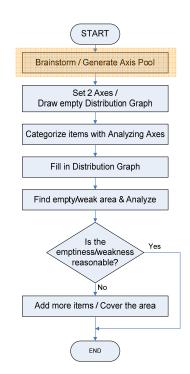


- Step 1: Brainstorm / Generate axis Pool
- Step 2: Draw empty Distribution Graphs
- Step 3: Categorize items with axes
- Step 4: Fill in Distribution Graphs
- Step 5: Analyze Distribution Graphs
- Step 6: Compensate weak area



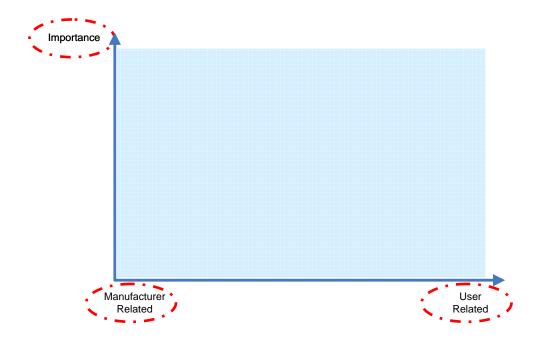
- Brainstorm as many axes as possible which can be used to check the coverage of requirement items
 - Add axes into axis pool
 - Examples of axes
 - Probability of successive accident
 - Manufacturer-related to user-related
 - Machine-related to human-related
 - Low electric current to high electric current
 - Idle speed to high speed

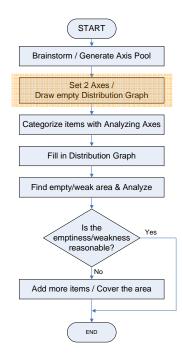






- Select two axes and draw Distribution Graphs
 - Consider all possible combinations formed by two axes out of axis pool
 - □ Select two axes whose combination is meaningful
 - Example
 - Axis 1: manufacturer-related to user-related
 - Axis 2: low probability to high probability of accident

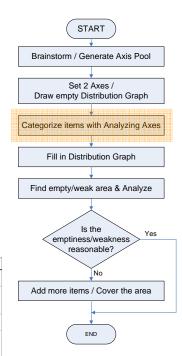




Step 3: Categorize items with axes

- Assign numbers to every requirement item of the item pool for every axis
 - Requirement items are categorized by the assigned numbers
 - Example (with Microsoft Excel)
 - User orientation: from 1(manufacturer-related) to 10(user-related)
 - Probability of successive accident: from 1(low) to 10(high)

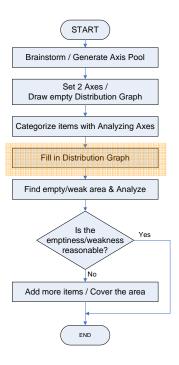
probability of accide	ent		manuf	acturer ↔ use	r
No Items	Importanc	e Manufacturer <-> User	Idle <-> Energized	Normal <-> Accidental	Tested <-> Just follow
1 Motor must be separated by at least XX cm from the vehicle chassis.	5	1::::::::::::::::::::::::::::::::::::::	2	1	1
Motor must be separated by at least XX cm from hydrogen tank and fuel cell stack,	- 8	1	2	1	1
3 Motor must be separated by at least XX cm from inverter and battery,	4	1	2	1	1
4 Motor must be electrically isolated from the chassis ground, the electrical isolation between motor and ground must be greater than XX Ohm.	7	1	2	1	1
5 Motor coil must be insulated from outside to prevent arcing,	2	2	2	1	2
Motor must be shielded by metallic enclosure which is grounded to chassis ground and shielding enclosure of motor must be insulated from outside.	311313131313113131	2	200	1	2
When an accident occurs, connection between motor and inverter must be blocked so that the motor should be de-energized to prevent following accidents.		5	2 2 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	2	2
8 Propulsion battery must be separated by at least XX cm from hydrogen tank and fuel cell stack.	7	1	2	1	1
Propulsion battery must be electrically isolated from the chassis ground, the electrical isolation between battery and ground must be greater than XX kOhm.		2	2	1	1
10 Propulsion battery must be insulated from the other electric components.	3	1	2	1	2
Battery must be shielded by metallic enclosure which is grounded to chassis ground and shielding enclosure of battery must be insulated from outside.		2	2	1	2
When an accident occurs, power connection between battery and inverter must be blocked so that the vehicle should be de-energized.	10	4	3	2	2
Even when an accident occurs, battery must be isolated from physical contact with passengers.	9	5	2	2	2

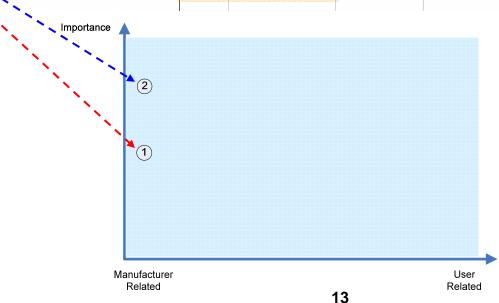


Step 4: Fill in Distribution Graphs

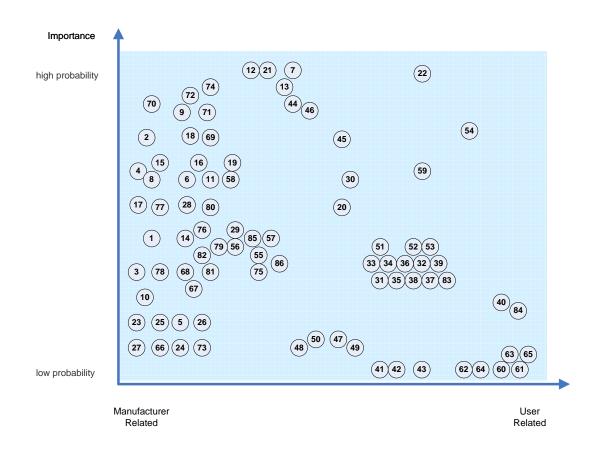
- Place requirement items into Distribution Graphs
 - □ For each requirement item, check numbers of two axes in the item pool
 - Place requirement on item into area decided by the numbers of two axes of the Distribution Graph

No Items	Impo	rtance	Manufacturer <-> User	Idle <-> Energized	Normal <-> Accidental	Tested <-> Just follow
1 Motor must be separated by at least XX cm from the vehicle chassis,		5		2	1	1
Motor must be separated by at least XX cm from hydrogen tank and fue		8	1	2	1	1
3 Motor must be separated by at least XX cm from inverter and battery.		4	1	2	1	1
4 Motor muss be electrically isolated from the chassis ground, the electrical isolation between motor and ground must be greater than XX Ohm.		7	1	2	1	1
5 Motor coil must be insulated from outside to prevent arcing,		2	2	2	1	2
Motor must be shielded by metallic enclosure which is grounded to chassis ground and shielding enclosure of motor must be insulated from outside.	[7	2	2	1	2

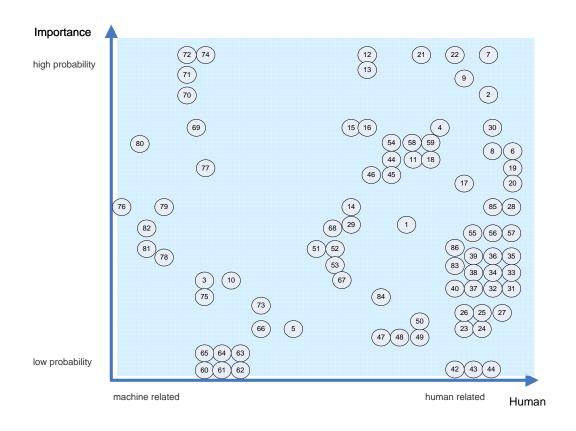




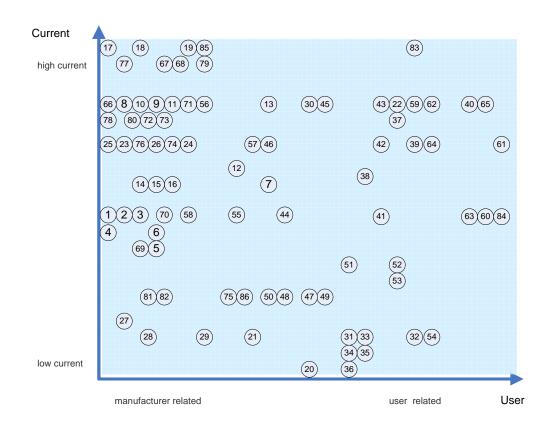
- Example of Distribution Graph #1
 - Axis 1: manufacturer-related to user-related
 - Axis 2: low probability to high probability of accident



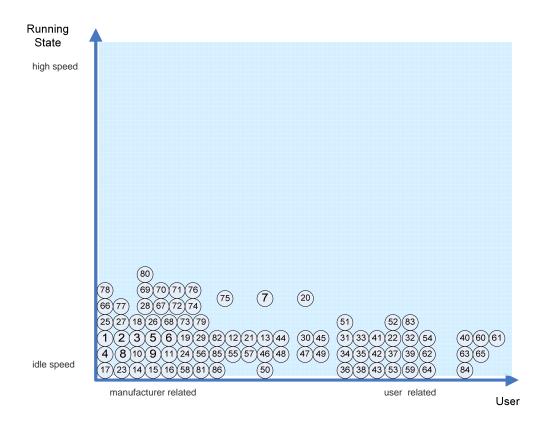
- Example of Distribution Graph #2
 - Axis 1: machine-related to human-related
 - Axis 2: low probability to high probability of accident



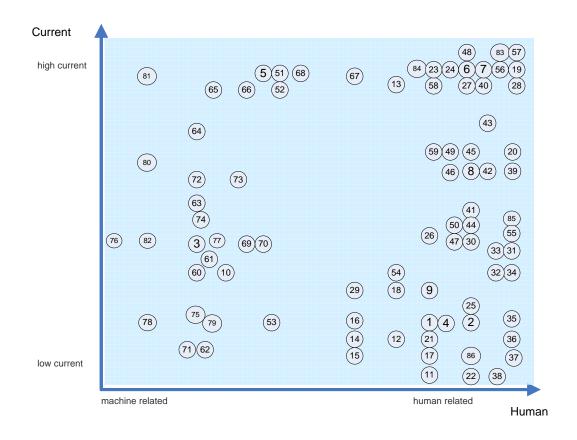
- Example of Distribution Graph #3
 - Axis 1: manufacturer-related to user-related
 - Axis 2: low electric current to high electric current



- Example of Distribution Graph #4
 - Axis 1: manufacturer-related to user-related
 - Axis 2: idle speed to high speed



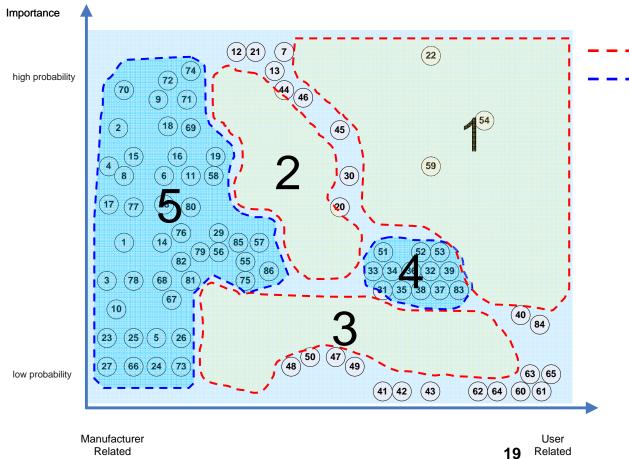
- Example of Distribution Graph #5
 - Axis 1: machine-related to human-related
 - Axis 2: low electric current to high electric current

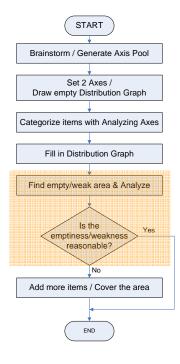


Step 5: Analyze Distribution Graphs

- Mark low density areas and high density areas to analyze distribution of the regulation items
- Assign zone to each area

Analyze implications using two axes information for each zone





Zone 1: High probability of accident caused by user responsibility

low density area

high density area

- Zone 2: High and medium probability of accident caused by both user and manufacturer responsibility
- Zone 3: Low probability of accident caused by both user and manufacturer responsibility
- Zone 4: Medium probability of accident caused by user responsibility
- Zone 5: Manufacturer oriented responsibility

Step 5: Analyze Distribution Graphs (Cont'd)

- Analyze low density zones
 - Decide whether more requirement items are needed
 - If the low density zones are reasonable, more items are not required
 - Also, check whether the low density is a result of inappropriate axis selection

Description:

High and medium probability of accident caused due to both user and manufacturer responsibility

Distribution Density:

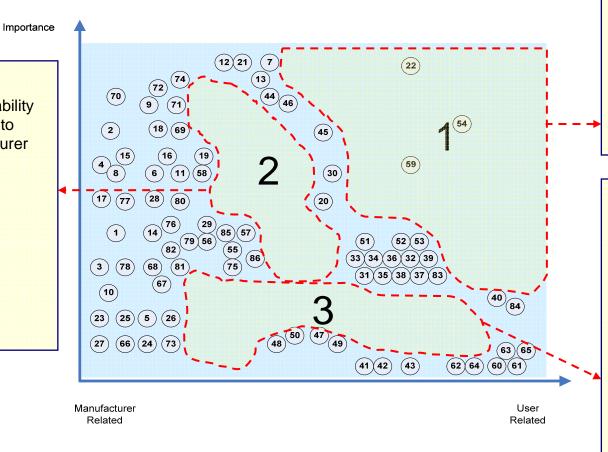
Very low

Analysis:

No specific reason for emptiness

Conclusion:

Need to be filled



Description:

High probability of accident caused due to user responsibility

Distribution Density:

Very low

Analysis:

Users don't need to take high responsibility

Conclusion:

No need for more regulations

Description:

Low probability of accident caused due to both user and manufacturer responsibility

Distribution Density:

Very low

Analysis:

No specific reason for emptiness. Typical safety related working environment can be added

Conclusion:

Need to be filled

Step 5: Analyze Distribution Graphs (Cont'd)

- Analysis of high density zones
 - Decide whether to merge certain regulation items or not
 - If there are duplicated items, merge them
 - □ Also, check whether the high density is a result of inappropriate axis selection

Description:

Manufacturer oriented responsibility

Distribution Density:

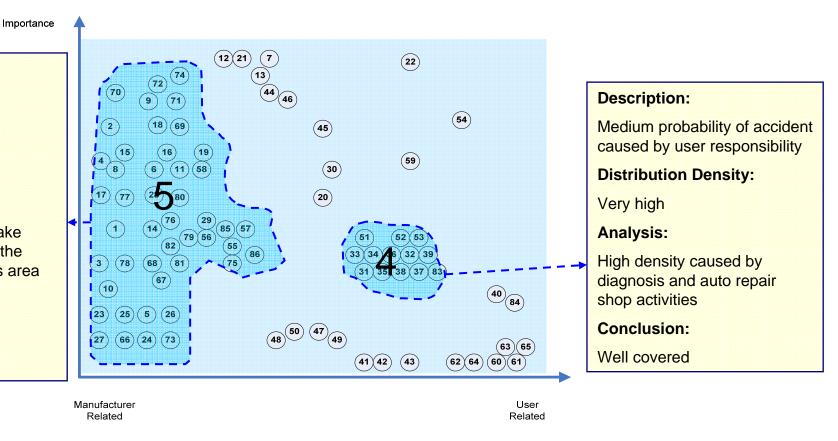
High

Analysis:

Manufacturer should take main responsibility for the safety of FCV, and this area shows well-distributed regulation items.

Conclusion:

Well covered



Step 6: Compensate weak area

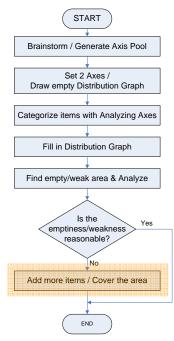
- Add additional requirement items to the low distribution density area inferring from surrounding requirement items
 - Select one of the surrounding requirement items as starting point (Ex: Item 71)
 - Analyze the property of starting point

Manufacturer

Related

Generate a new requirement item inferring from the property of starting point

71. Battery should be designed to work normally (Voltage maintains at Importance xx V - xx V, Energy xx W - xx W, temperature under xx C) longer than xx hours. more related to user (54) 95. Every battery should be diagnosed before released to market. Battery should work normally as specified in regulation item 71. more related to user 33 (34 (36) 32 (39 (3) (78) (68) 99. A 10 Year warranty should be 31 (35 (38) 37 (83 (10) given by manufacturer to the customer. Incase if the normal work 23 (25) (5) (26) condition of item 71 is not satisfied. 27) (66) (24) (73) 63 65 battery should be replaced free of (41)(42) (43) (62) (64) (60) (61) charge.

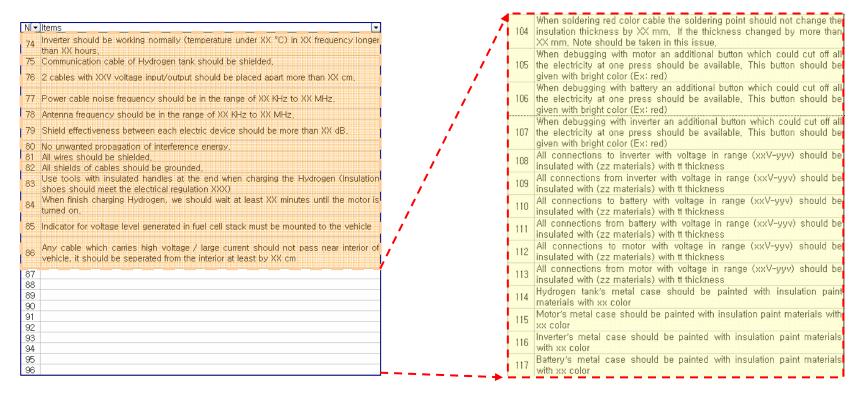


User Related

Result of Regulation Coverage Analysis Method

- 86 items before process applied
- 21 items can be added after Regulation Coverage Analysis Method





Added Item Poll

item pool before process applied

item pool after process applied

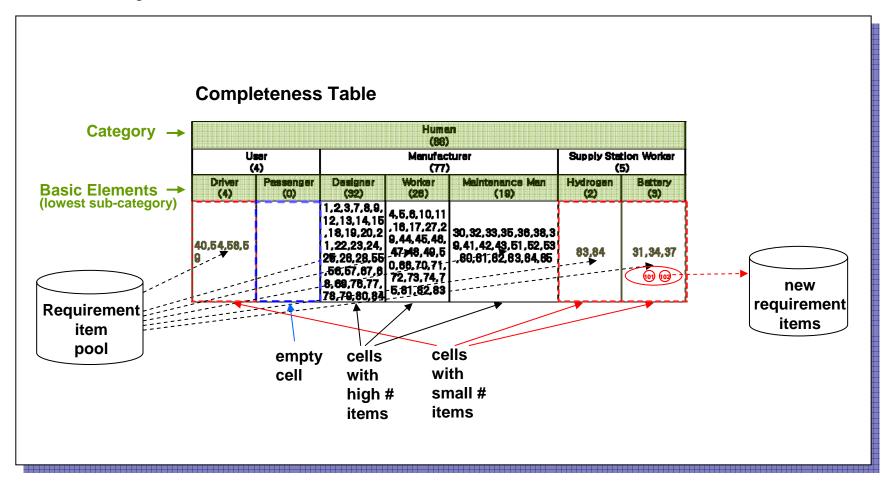
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Regulation Completeness Analysis Method

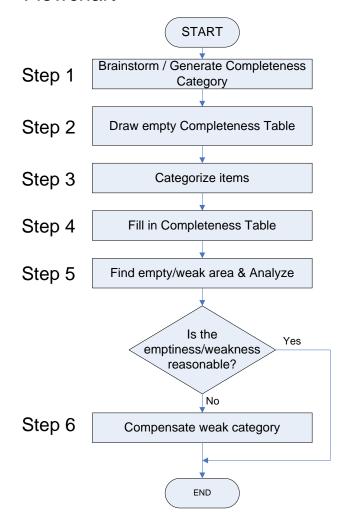
Concept

 Distribute requirement items onto "Completeness Table" to check completeness and add more items to missing cells



Regulation Completeness Analysis Method

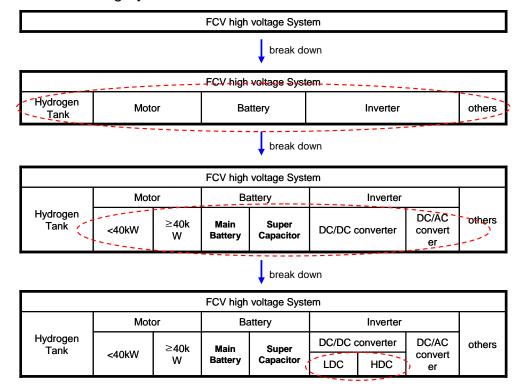
Flowchart

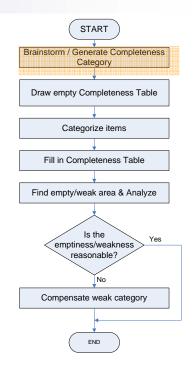


- Step 1: Brainstorm/Generate Completeness Category
- Step 2: Draw empty Completeness Table
- Step 3: Categorize items
- Step 4: Fill in Completeness Table
- Step 5: Analyze Completeness Table
- Step 6: Compensate weak category



- Brainstorm as many categories as possible which can be used to check the completeness of requirement items
 - Find categories
 - Break down each category to form a hierarchical structure
 - Break down as far as possible until basic elements are found
 - lowest sub category





Step 1: Brainstorm/Generate Completeness Category (Cont'd)

- Examples
 - □ Human
 - □ FCV high voltage system
 - Insulation
 - Vehicle state

			Huma	n			
Us	ser	Manufacturer			Supply Station Worke		
Driver	Passenger	Designer	Worker	Maintenance Man	Hydrogen	Battery	

FCV high voltage System									
	Mote	or	Ва	attery		Inverter			
Hydrogen Tank		≥40k	Main Battery	Super	DC/DC d	converter	DC/AC convert er	others	
Tank	<40kW	W		Capacitor	LDC	HDC			

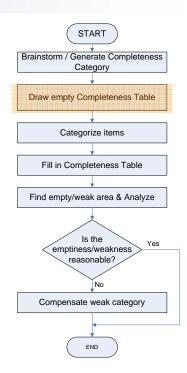
Insulation									
		Human			Vehicle				
Gloves	Gloves Shoes Clothes Glass Helmet				Jacket	Equipment case	Connector body		

Vehicle State						
Parking	Idleness	Driving				



- Select one category and draw Completeness Table
 - Make cells which can be filled with item numbers
- Example
 - Human category
 - All human who could possibly be related to FCV

	Human									
Us	ser		Manufac	Supply Station Worker						
Driver	Passenger	Designer	Worker	Maintenance Man	Hydrogen Battery					
1										
) }										



Place to be filled with item numbers

Step 3: Categorize items

- Assign numbers to every requirement items of the item pool for every axis
 - Regulation items are categorized by basic elements
 - Example (Using Microsoft Excel)
 - Human category
 - driver, passenger, designer, worker, maintenance man, hydrogen station worker, battery station worker



Brainstorm / Generate Completeness
Category

Draw empty Completeness Table

Categorize items

Fill in Completeness Table

Find empty/weak area & Analyze

Is the emptiness/weakness reasonable?

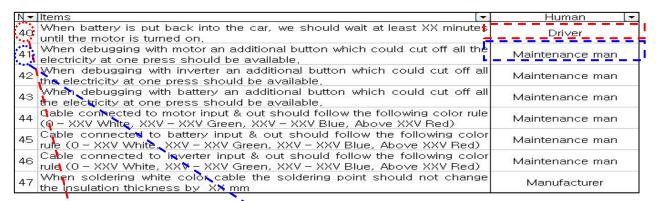
Ves
reasonable?

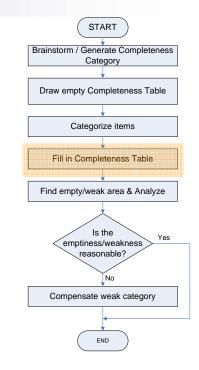
Compensate weak category

Human category

Step 4: Fill in Completeness Table

- Place all requirement item numbers in the Completeness Table
 - For each requirement item, check elements of the category
 - Place requirement item number into cells in the Completeness Table





Human									
User Manufacturer Supply Station Worke									
Driver	Passenger	Designer	Worker	Maintenance Man	Hydrogen	Battery			
40		1,2,3,7,8,9, 12,13,14,15 ,18,19,20,2 1,22,23,24, 25,26,28		30,32,33,35,36,38,3 9,41		31,34,37			



- Example of Completeness Table #1
 - ☐ Human
 - User: Driver, Passenger
 - Manufacturer: Designer, Maker, Maintenance man
 - Supply Station Worker: Hydrogen, Battery

	Human (86)									
	ser 4)		Manufac (77)	turer		tion Worker 5)				
Driver (4)	Passenger (0)	Designer (32)	Worker (26)	Maintenance Man (19)	Hydrogen (2)	Battery (3)				
40,54,58,5		1,2,3,7,8,9, 12,13,14,15,18,19,20,2 1,22,23,24, 25,26,28,55,56,57,67,6 8,69,76,77,78,79,80,84	9,44,45,46, 17 18 10 5	4 42 44 45 46 48 4	83,84	31,34,37				

Human category



Step 4: Fill in Completeness Table (Cont'd)

- Example of Completeness Table #2
 - Insulation
 - Human: Gloves, Shoes, Clothes, Glass, Helmet
 - Vehicle: Jacket, Equipment case, Connector body

	Insulation (22)										
		Human (10)			Vehicle (12)						
Gloves (3)	Shoes (7)	Clothes (0)	Glass (0)	Helmet (0)	Jacket (7)	Equipment case (5)	Connector body (0)				
	34,35,36, 37,38,39, 83				5,27,29,47, 48,49,50	6,10,11,16,17					

Insulation category



- Example of Completeness Table #3
 - □ FCV system
 - Hydrogen tank. Motor, Battery, Inverter, Chassis, General

	FCV System (86)								
Hydrogen Tank (11)	Motor (23)	Battery (16)	Inverter (14)	Chassis (1)	General (21)				
22,17,18,19,20,21,7 5,85,59,83,84	1,2,3,5,6,9,40,44,58,66, 4,7,12,32,35,38,41,51,5 5,60,63,69,70		14,15,16,33 ,36,39,42,4 6,52,57,61, 64,73,74,		23,24,25,26,27, 29,30,47,48,49, 50,67,68,76,77, 78,79,80,81,82, 86				

FCV system category

Step 4: Fill in Completeness Table (Cont'd)

- Example of Completeness Table #4
 - Vehicle state
 - Parking (off state)
 - Idleness (not running state)
 - Driving (running state)

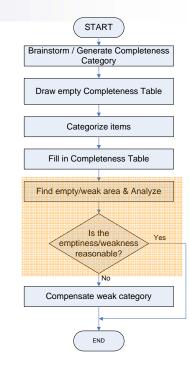
Vehicle State (86)								
Parking (56)	Idleness (29)	Driving (1)						
1 2 3 4 5 6 8 0 10 11 13 14 15 16	7,12,20,22,28,30,32,33, 38,39,41,42,43,51,52,53 ,60,61,62,63,64,65,70,7 1,72,74,77,78,79	54						

Vehicle state category



- Mark blank cells or cells with small number of requirement items to analyze completeness of the requirement items
- Check whether it is necessary to add new requirement items
 - Mark red when needed, blue when not needed

Human (86)										
User (4)		Manufacturer (77)			Supply Station Worker (5)					
Driver (4)	Passenger (0)	Designer (32)	Worker (26)	Maintenance Man (19)	Hydrogen (2)	Battery (3)				
40,54,58,5 9		1,2,3,7,8,9, 12,13,14,15 ,18,19,20,2 1,22,23,24, 25,26,28,55 ,56,57,67,6 8,69,76,77, 78,79,80,84	72,73,74,7	30,32,33,35,36,38,3 9,41,42,43,51,52,53 ,60,61,62,63,64,65	83,84	31,34,37				



No need to add more items

Passenger does not need to follow any regulation

More items need to be added

Hydrogen and battery supply station workers need more requirement to prevent FCV high voltage accidents



- Add additional requirement items to empty cells or cells with small amount of requirement items
 - Use similarity to generate new requirement items
 - Item 35 related to maintenance man can be used to generate new items (101,102) for battery supply station worker

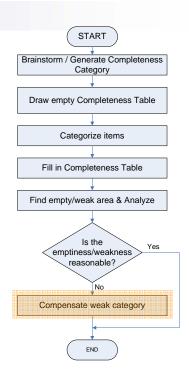
use similarity use expandability

35: Wear insulation shoes when debugging with the motor (Insulation shoes should meet the electrical regulation XXX)

new 101: Wear insulation shoes when charging electric vehicle battery (Insulation shoes should meet the electrical regulation XXX)

new 102: Wear ESD preventive clothes when charging electric vehicle battery (ESD preventive clothes should meet the electrical regulation XXX)

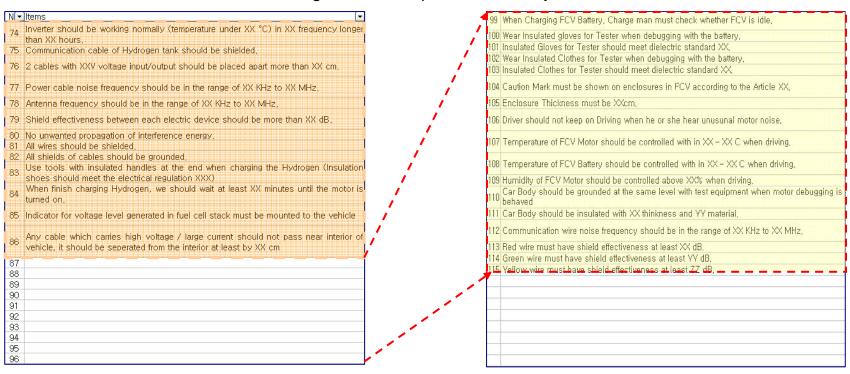
Human (86)										
User (4)		Manufacturer (77)			Supply Station Worker (5)					
Driver (4)	Passenger (0)	Designer (32)	Worker (26)	Maintenance Man (19)	Hydrogen (2)	Battery (3)				
40,54,58,5 9		1,2,3,7,8,9, 12,13,14,15,18,19,20,2 1,22,23,24, 25,26,28,55,56,57,67,6 8,69,76,77,78,79,80,84	9,44,45,46, 47,48,49,5 0,66,70,71, 72,73,74,7	4 42 44 45 45 48 4	83,84	31,34,37 101 102				



Result of Regulation Completeness Analysis Method

- Result of the whole process
 - 86 items before process applied
 - 29 new items added after Regulation Completeness Analysis method





item pool before process applied

item pool after process applied



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Conclusion

Conclusion

- Rulemaking process of electrical safety regulation for fuel cell vehicle high voltage systems is proposed
 - We propose Regulation Coverage Analysis Method
 - □ Find regulation missing areas with proposed "Distribution Graph"
 - Add more requirements by systematic brainstorming
 - We propose Regulation Completeness Analysis Method
 - □ Verify completeness with proposed "Completeness Table"
 - Add more requirements by inferring from other requirements