

May 5, 2004

MEMORANDUM TO: Joseph G. Giitter, Chief
Special Projects Branch
Division of Fuel Cycle Safety
And Safeguards

THRU: Brian W. Smith, Chief /RA/
Gas Centrifuge Facility Licensing Section
Special Projects Branch
Division of Fuel Cycle Safety
And Safeguards

FROM: Wilkins R. Smith /RA/
Quality Assurance Scientist
Mixed Oxide Facility Licensing Section
Special Projects Branch
Division of Fuel Cycle Safety
And Safeguards

SUBJECT: MARCH 8 and 12, 2004, CONFERENCE CALLS WITH LOUISIANA
ENERGY SERVICES REGARDING IMPLEMENTATION OF QUALITY
ASSURANCE PROGRAM DESCRIPTION FOR THE NATIONAL
ENRICHMENT FACILITY LICENSE APPLICATION

Telephone conferences were held on March 8 and 12, 2004 with representatives of Louisiana Energy Services (LES) to obtain information for the development of the safety evaluation report for the staff review of the LES Quality Assurance Program Description (QAPD). For the March 8 conference, the U.S. Nuclear Regulatory Commission (NRC) participants were Timothy Johnson, William Troskoski, Harry Felsher, and Wilkins Smith, and the LES representatives were Dan Green, Dave Pepe, Michael Kennedy, and Rod Krich. For the March 12 conference, the participants were Wilkins Smith and Rod Krich. A summary of the conference calls is attached.

Docket No: 70-3103

cc: William Szymanski/DOE	Claydean Claiborne/Jal
Rod Krich/Exelon	Monty Newman/Hobbs
James Curtiss/W&S	Troy Harris/Lovington
Peter Miner/USEC	Betty Richman/Tatum
James Ferland/LES	Glen Hackler/Andrews
Dennis Holmberg/Lea County	William Floyd/New Mexico
James Brown/Eunice	Richard Ratliff/Texas
Michael Marriotte/NIRS	Jerry Clift/Hartsville
CO'Claire/Ohio	Lee Cheney/CNIC
Derrith Watchman-Moore/NM	Joseph Malherek/PC
Ron Curry/NMED	Clay Clark/NMED
Patricia Madrid/NMAG	Glen Smith/NMAG
Lindsay Lovejoy/NIRS	

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LES Conference Calls Summary (March 8 and 12, 2004)

These conference calls were to obtain information for the development of the safety evaluation report (SER) for the staff review of the Louisiana Energy Services (LES) Quality Assurance Program Description (QAPD) submitted as a part of the LES National Enrichment Facility License Application.

The implementation of the QAPD commitments for the following topics was addressed in the March 8 call:

- (1) Quality Assurance (QA) program indoctrination/training requirements;
- (2) QA requirements for QA Level 2 Structures, Systems, and Components (SSCs);
- (3) Design documentation traceability;
- (4) Applicability of 10 CFR Part 21 to non-IROFS (items relied on for safety); and
- (5) QA program controls and oversight interface with criticality safety program.

QA program indoctrination/training requirements

QAPD Section 2, "Quality Assurance Program," states that personnel performing QA Level 1 activities will be required to receive QA indoctrination training. The staff inquired why all personnel are not required to receive this training. The applicant stated that the QAPD statement was made to make an explicit commitment for personnel performing QA Level 1 activities, and that all full-time employees will receive appropriate QA program indoctrination training.

QA Requirements for QA Level 2 SSCs

The staff noted that QAPD Section 2, "Quality Assurance Program," states that an International Standards Organization (ISO) 9000 standards QA program may be acceptable for suppliers of items with QA Level 2 requirements. The staff asked if the suppliers' program capability and compliance with engineering and product requirements would also be evaluated before placement of the procurement. The applicant confirmed that the suppliers' capability to meet and comply with all program, product, and technical requirements would be evaluated prior to procurement and would be appropriately documented.

Design documentation traceability

The staff noted that QAPD Section 3, "Design Control," states that if a commercial grade item is modified and/or tested to new requirements that are more restrictive, the component will be traceable to documentation noting the difference. The staff was concerned that the item should be traceable to documentation noting the difference whenever a change or new requirements are applied, whether it is more restrictive or otherwise. LES stated that they would apply a requirement for items with different requirements to be traceable to documentation of the differences in all cases.

Applicability of 10 CFR Part 21 to non-IROFS

The staff noted that QAPD Section 4, "Procurement Document Control," states that the requirements of 10 CFR Part 21, "Reporting of Defects and Nonconformance," are applicable to QA Level 1 items, but does not commit to Part 21 requirements which might apply to non-QA Level 1 items. The applicant stated that the requirements of Part 21 will be applied where applicable, regardless of QA Level.

QA program controls and oversight interface with criticality safety program

The implementation of QA program controls specifically for the criticality safety program was discussed. The applicant stated that the criticality safety program, including criticality analyses, documents, procedures, training, audits, and records are under the QA program requirements as addressed in the QAPD. Some activities such as assessments would be conducted by the responsible line organization, but would be controlled and documented in accordance with the QAPD.

At the conclusion of the March 8, 2004, call, staff stated that they would review the discussion and LES comments, and identify any topics that would warrant written clarification or commitment from the applicant. In the March 12, 2004, conference call, staff requested written confirmation of the applicant's clarification or commitment for the topics of QA program indoctrination/training requirements, design documentation traceability, and applicability of 10 CFR Part 21 to non-IROFS. LES confirmed their clarifications and/or commitments on these topics in a March 12, 2004, letter to the U.S. Nuclear Regulatory Commission (NRC), Subject: Response to NRC Request Concerning the Quality Assurance Program Description.

Staff questions related to all of the above topics regarding QAPD implementation were resolved by the telephone calls and March 12, 2004, LES letter. The information obtained from the calls and the letter of clarification was used in the development of the Safety Evaluation Report for the staff review of the LES QAPD.