

January 31, 2007

Mr. Ronnie L. Gardner
AREVA NP Inc.
3315 Old Forest Road
P.O. Box 10935
Lynchburg, VA 24506-0935

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TOPICAL
REPORT (TR) ANP-10266NP, "AREVA NP, INC. QUALITY ASSURANCE PLAN
FOR DESIGN AND DEPLOYMENT OF U.S. EVOLUTIONARY POWER
REACTOR (EPR)" (TAC NO. MD2402)

Dear Mr. Gardner:

By letter dated September 22, 2006 (ML062700315), AREVA NP Inc. submitted for U.S. Nuclear Regulatory Commission (NRC) staff review Topical Report ANP-10266NP, Revision 0, "AREVA NP, Inc. Quality Assurance Plan for Design and Deployment of US Evolutionary Power Reactor Report for the U.S. EPR." The NRC staff has reviewed the application and has determined that additional information is required. Our questions are provided in the enclosure.

A draft of the additional information requested was provided to you on December 20, 2006 (ML070170367), and discussed with your staff on January 4 and 16. As a result of these discussions, we have deleted four questions that were in the draft and you have agreed to submit a revised TR as part of your response. Your staff has also agreed that your response would be provided by February 28, 2007.

If you have any questions regarding this matter, I may be reached at (301) 415-3361.

Sincerely,

/RA/

Getachew Tesfaye, Project Manager
EPR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Project No. 733

Enclosure:
Request for Additional Information

cc w/encl: See next page

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ADAMS ACCESSION NO.: ML070170494

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REQUEST FOR ADDITIONAL INFORMATION

TOPICAL REPORT ANP-10266NP, REVISION 0, "AREVA NP, INC. QUALITY
ASSURANCE PLAN FOR DESIGN AND DEPLOYMENT OF U.S. EVOLUTIONARY POWER
REACTOR (U.S. EPR)" (TAC NO. MD2402)
PROJECT NUMBER 733

PART I INTRODUCTION

1. Draft Standard Review Plan (SRP) 17.5, dated September 22, 2006, states that a Quality Assurance Program Description (QAPD) submitted by a Design Certification (DC) applicant would only address design quality assurance (QA) activities in support of a DC. Revision 0 of the AREVA QAPD, Disclaimer, states, in part, that this topical report (TR) is being submitted by AREVA NP to the U.S. Nuclear Regulatory Commission (NRC) to facilitate future licensing processes that may be pursued by licensees or applicants that are customers of AREVA NP. The AREVA QAPD, Section 0.1, Purpose, further states, in part, that "this document describes the Quality Assurance Plan (QAP) for the design and **deployment** (emphasis added) of commercial nuclear operating plants." Given these statements in the AREVA QAPD, the staff needs clarification of the overall scope (e.g., DC, ESP, COL) and activities that apply to the AREVA QAPD.

Specifically, 10 CFR 52.17 (a)(1)(xii) requires the applicant of an early site permit (ESP) to include a QAPD that satisfies applicable portions of Appendix B to 10 CFR Part 50. 10 CFR 52.79 (a)(25) requires that the applicant of a combined license (COL) includes a QAPD to be applied to the design, fabrication, construction, and testing of the structures, systems, and components of the facility that satisfies applicable portions of Appendix B to 10 CFR Part 50.

For consistency with the above regulations, the staff needs clarification of the overall scope (e.g., DC, ESP, COL) and activities that apply to the QAPD

2. Revision 0 of the AREVA QAP, Section 0.1.1, "Scope," describes that the QAP is in compliance with regulations, codes, standards, and other requirements listed in Section 2.1.3. Provide a copy of the referenced Section in the document.
3. Revision 0 of the AREVA QAP, Section 0.1.1, "Scope," describes that the QAP is written to comply with NQA-1-1994. Since the QAP is written to comply with NQA-1-1994, clarify if the QAP commits to NQA-1-1994 and if any exception, alternative or clarification from NQA-1-1994 are applicable to the QAP.
4. Revision 0 of the AREVA QAP, Section 0.1.1, "Scope," describes that typical policies, procedures, and instructions (PP&Is) detail the implementation of the controls to accomplish compliance with NQA-1-1994. AREVA is proposing a unique approach in crediting their PP&Is to meet NQA-1-1994. The staff performs its reviews to the most current guidance draft SRP 17.5. Provide an outline or matrix of the criteria used in each PP&I for which the QAP takes credit to meet NQA-1-1994.

Enclosure

PART II AREVA QAPD DETAILS

SECTION 1 ORGANIZATION

5. Draft Standard Review Plan (SRP) 17.5, dated September 22, 2006, paragraph II.A.1 states that at the most senior management level, the applicant or holder is to issue a written QAPD that establishes the quality policy and commits the organization to implement it. Revision 0 of the AREVA QAPD, Section 1.7, "U.S. Region Quality," describes the Vice President of U.S. Region Quality, as having the responsibility for the development, preparation, maintenance, and revision of the QAPD. Clarify if the Vice President of U.S. Region Quality is the most senior management level, and if not, the AREVA QAPD must be signed by the President and CEO or their designee.
6. Draft SRP Section 17.5, paragraph II.A.3, states that, for multiple organizations, the QA program organizational description should clearly define the interface responsibilities. Section 1.0, "Organization," of the AREVA QAPD, provides a description of the functions and responsibilities of the organizations of the company, and references "Exhibit 1A and Exhibit 1B." Provide a copy of each exhibit referenced in the document, and clarify how the multiple organizations described in the QAPD interface with each other.
7. Draft SRP Section 17.5, paragraph II.A.7, states that management should ensure that the size of the QA organization is commensurate with its duties and responsibilities. In order to satisfy the Three Mile Island (TMI)-related requirement contained in 10 CFR 50.34(f)(3)(iii)(A), clarify how the QAPD provides this guidance as it applies to activities for the US EPR to ensure that the size of the QA organization is commensurate with its duties and responsibilities.
8. Draft SRP Section 17.5, paragraphs II.A.11 and II.A.12, discusses responsibilities and authority associated with the delegation of activities associated with the overall QA program. Section 1.0, "Organization," of the AREVA QAPD does not address this area. Provide a discussion of this topic, if applicable, in the AREVA QAPD.

SECTION 2 QUALITY ASSURANCE (QA) PROGRAM

9. Draft SRP Section 17.5, paragraphs II.B.2, states that the QAPD should include the criteria used to identify the items and activities to which the QA program applies. Section 2.1.2, "General," of the AREVA QAPD states that the criteria for determining this classification is contained in a procedure based on Regulatory Guide (RG) 1.26. Provide the information contained in this procedure related to the criteria used to identify these items and activities.
10. Draft SRP Section 17.5, paragraphs II.B.3, states that the QA program assures that activities affecting quality are accomplished under suitably controlled conditions. The AREVA QAPD does not address this criteria.
11. Draft SRP Section 17.5, paragraph II.S.2, states the qualification requirements for individuals responsible for managing the implementation of the QA plan. Section 2.1.6,

“QAP Indoctrination and Training,” of the AREVA QAPD does not address the criteria described in the applicable section of the draft SRP. Provide a description of the qualification requirements.

12. Draft SRP Section 17.5, paragraph II.S.3, states the qualification requirements for individuals responsible for planning, implementing, and maintaining the QA plan. Section 2.1.6, “QAP Indoctrination and Training,” of the AREVA QAPD does not address the criteria described in the applicable section of the draft SRP. Provide a description of the qualification requirements.

SECTION 3 DESIGN CONTROL

13. Draft SRP Section 17.5, paragraph II.C.1 and C.2 provides the design and design verification controls measures. Section 3.3, "Implementation," describes that design control measures are applied to safety related items and services as defined in written procedures and instructions. Provide a discussion of the criteria described in written procedures and instructions.
14. Draft SRP Section 17.5, paragraph II.C.1.n, states that the QA role in design and analysis activities is defined, and design documents are reviewed by individuals knowledgeable and qualified in QA to ensure the documents contain the necessary QA requirements. The inclusion of these criteria satisfy the TMI-related requirement contained in 10 CFR 50.34(f)(3)(iii)(H). Section 3.0, “Design Control,” of the AREVA QAPD does not address this criteria. Provide a discussion of this criteria as it applies to activities for the U.S. EPR.
15. 10 CFR 50.34(f)(3)(iii)(c) requires that QA personnel are included in the documented review and concurrence of quality-related procedures associated with design, construction, and installation. Describe how AREVA will implement measures to control the documented review and concurrence of quality-related procedures consistent with the requirements of 10 CFR 50.34(f)(3)(iii)(c).
16. Section 3.4, “Design Inputs,” of the AREVA QAPD, states, in part, that design documents shall be adequate to support facility design, construction, and operation. Define "adequate" and how the AREVA QAPD ensures that design document controls support activities for the U.S. EPR.
17. Draft SRP Section 17.5, paragraph II.C.1.p, states that where a significant design change is necessary because of an incorrect design, the design process and verification procedure is reviewed and modified as necessary. Section 3.0, “Design Control,” of the AREVA QAPD does not address this criteria. Provide a discussion of this criteria as it applies to activities for the U.S. EPR.

SECTION 6 DOCUMENT CONTROL

18. Draft SRP Section 17.5, paragraph II.F.9.b, states that there should be coordination and control of interface documents. Section 6.0, “Document Control,” of the AREVA QAPD does not address this criteria explicitly, although there is a brief description of both

supplier-prepared and customer-prepared documents. Provide a discussion of the coordination and control of interface documents as it applies to activities for the U.S. EPR.

19. Draft SRP Section 17.5, paragraph II.F.8 and paragraph II.F.10, discuss certain requirements placed on procedures as well as use of temporary instructions used during the operational phase of a nuclear power plant. Section 6.0, "Document Control," of the AREVA QAPD does not address these criteria. Provide a discussion of the these issues as they apply to activities for the U.S. EPR.

SECTION 7 CONTROL OF PURCHASED MATERIALS, ITEMS, AND SERVICES

20. Draft SRP Section 17.5, paragraph II.G.6, states that the procurement of components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service and to the purchaser's QA program requirements. Explain how this requirement is met in the AREVA QAPD.
21. Draft SRP Section 17.5, paragraph II.G.9, states, in part, that the measures for evaluation and selection of procurement sources include "a direct evaluation of supplier facilities and personnel....." Section 7.3, "Supplier Evaluation and Selection," of the AREVA QAPD, states, in part, "An evaluation of their QA Program to 10 CFR Appendix B and NQA-1 to determine the capability to supply materials, items, or services" The term "Direct" was omitted and should be added to the affected section.
22. Section 7.3, "Supplier Evaluation and Selection," of the AREVA QAPD, states, in part, "AREVA NP may verify acceptance of products by independent analysis." Provide a discussion of what the independent analysis is and the extent of its applicability to activities for the U.S. EPR.
23. Draft SRP Section 17.5, paragraph II.G.16(a-f), describes the minimum acceptable list of criteria to be included in the Certificate of Conformance (COC). Section 7.8, "Certifications of Conformance (COC/QA Data Packages)," states, in part, that a QA Data Package provides objective evidence that the materials and items meet the requirements of the customer's order, but does not explicitly address the minimum acceptable list of criteria to be included in the COC. Provide a discussion of the these criteria as they apply to COCs related to activities for the U.S. EPR.
24. Draft SRP Section 17.5, paragraph II.G.19, states, in part, that receiving inspection is performed to verify by objective evidence such features as proper configuration; identification; dimensional; physical; and other characteristics; freedom from shipping damage; and cleanliness. Section 7.6.1, "Receiving Inspection," of the AREVA QAPD does not explicitly address these features. The QAPD does however, indicate that such receiving inspections may be conducted on an individual item or sampling basis. Provide a discussion of the these receiving inspection features, and the conduct of either individual or sampling inspection, as they apply to activities for the U.S. EPR.

25. Draft SRP Section 17.5, paragraph II.G.2, states that the program should include provisions for evaluating prospective suppliers and selecting only qualified suppliers. Section 7.4 of the QAP describes that with project management and QA approval, suppliers not on the approved supplier list may be selected in situations where unique products or services are needed. Provide a discussion on the acceptability of vendors of unique components without performing an audit or survey.

SECTION 8 IDENTIFICATION AND CONTROL OF ITEMS AND MATERIALS

26. Draft SRP Section 17.5, paragraph II.H.6, states, in part, that provisions are made for the control of an item's identification consistent with the planned duration and conditions of storage. Section 8.2, "General," of the AREVA QAPD does not explicitly address these criteria. Provide a discussion of the how the identification of items and materials consistent with the planned duration and conditions of storage apply to activities for the U.S. EPR.

SECTION 9 CONTROL OF SPECIAL PROCESSES

27. Draft SRP Section 17.5, paragraph II.I.7, states that for special processes not covered by existing codes and standards or where quality requirements specified for an item exceed those of existing codes or standards, the necessary requirements for qualifications of personnel, procedures, or equipment are specified or referenced in the procedures or instructions. Section 9.0, "Control of Special Processes," of the AREVA QAPD does not address this criteria. Therefore, provide a discussion of the how this criteria applies to activities for the U.S. EPR.

SECTION 10 INSPECTION

28. Section 10.2, Scope," of the AREVA QAPD contains a spelling error. "Verily" should be changed to "verify."

SECTION 11 TEST CONTROL

29. Draft SRP Section 17.5, paragraph II.K.6, provides a description of the minimum information to be included in test records, including, but not limited to, identification of item tested, recorder used, type of observation, action taken in connection with any deviation noted, and person evaluating the test results. Section 11.3, "Implementation," provides a brief description of test results indicating that these results will be documented, evaluated, and their acceptability determined, but does not explicitly address the criteria specified in the draft SRP. Therefore, provide a discussion of the how these criteria apply to activities for the U.S. EPR.

SECTION 12 CONTROL OF MEASURING AND TEST EQUIPMENT (M&TE)

30. Draft SRP Section 17.5, paragraph II.L.4, states that, M&TE are calibrated, adjusted, at prescribed intervals or, prior to use, against certified equipment having known valid relationships to nationally recognized standards. If no nationally recognized standards exist, the bases for calibration are documented. Section 12.0, "Control of Measuring

and Test Equipment,” of the AREVA QAPD does not explicitly address these criteria. Therefore, provide a discussion of the how these criteria apply to activities for the U.S. EPR.

31. Draft SRP Section 17.5, paragraph II.L.8, states that, for procurement of commercial-grade calibration services for safety-related applications, laboratory accreditation programs administered by the National Institute of Standards and Technology and by the American Association for Laboratory Accreditation (A2LA) and National Voluntary Accreditation Program (NAVLAP), as recognized through the mutual recognition arrangement of International Laboratory Accreditation Program (ILAC), are acceptable in lieu of a supplier audit, commercial-grade survey, or in-process surveillance, provided that certain conditions are met. Section 12.3.3, “M&TE Suppliers and M&TE Calibration Services,” of the AREVA QAPD states, in part, that other methods such as A2LA and NAVLAP may be used to approve M&TE suppliers provided that conditions required by the NRC are satisfied. The staff requests that the applicant explicitly identify those conditions required by the NRC consistent with the description provided in draft SRP Section 17.5, paragraph II.L.8 and that these conditions are acceptable in lieu of a supplier audit, commercial-grade survey, or in-process surveillance.

SECTION 13 HANDLING, STORAGE, AND SHIPPING

32. Draft SRP Section 17.5, paragraph II.M.5, states that operators of special handling and lifting equipment are experienced or trained in use of the equipment. Section 13.3.4, “Handling,” of the AREVA QAPD does not address this issue. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
33. Draft SRP Section 17.5, paragraph II.M.7, states that controls for hoisting, rigging, and transport activities are required to be established that protect the integrity of the item involved as well as potentially affected nearby structures and components. Applicable hoisting, rigging, and transportation regulations and codes are followed. Section 13.3.4, “Handling,” of the AREVA QAPD does not address this issue. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
34. Draft SRP Section 17.5, paragraph II.M.8, states that during operation, cleanliness controls for work on safety related and risk-significant non-safety related equipment are required to be established to the extent necessary to minimize the introduction of foreign material and maintain system/component cleanliness throughout maintenance or modification activities. Section 13.3, “Implementation,” of the AREVA QAPD does not address this issue. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.

SECTION 14 INSPECTION, TEST, AND OPERATING STATUS

35. Draft SRP Section 17.5, paragraph II.N.3, states that measures are required to be established for indicating the operating status of structure, system, and components

(SSCs) of a nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation. Section 14.0, "Inspection, Test, and Operating Status," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.

36. Draft SRP Section 17.5, paragraph II.N.5, states that temporary modifications, such as temporary bypass lines, electrical jumpers, lifted electrical leads, and temporary trip point setting, are controlled by approved procedures, which include a requirement for independent verification. Section 14.0, "Inspection, Test, and Operating Status," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.

SECTION 15 NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

37. Section 15.2, "General," of the AREVA QAPD, first sentence, should be revised to add the term "materials," to be consistent with the purpose description provided in Section 15.1, "Purpose," of the AREVA QAPD.
38. Draft SRP Section 17.5, paragraph II.O.4, states that personnel performing evaluations to determine a disposition have demonstrated competence in the specific area they are evaluating, have an adequate understanding of the requirements, and have access to pertinent background information. Section 15.0, "Control of Nonconforming Items," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
39. Draft SRP Section 17.5, paragraph II.O.6, states that reworked, repaired, and replacement items are inspected and tested in accordance with the original inspection and test requirements or specified alternatives. Section 15.0, "Control of Nonconforming Items," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
40. Section 15.3.2, "Safety Concerns," of the AREVA QAPD, briefly describes those circumstances that may lead to initiating a 10 CFR Part 21 review. The term "substantial safety hazards" is used, but the term is not defined in the Section 15 or in Appendix C, "Definitions," of the AREVA QAPD. The staff requests that this term be defined within the AREVA QAPD.

SECTION 16 CORRECTIVE ACTION

41. Section 16.2, "General," of the AREVA QAPD, briefly describes conditions adverse to quality, including failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances. However, these terms are not defined in the Section 16 or in Appendix C, "Definitions," of the AREVA QAPD. The staff requests that these terms be defined within the AREVA QAPD.
42. Draft SRP Section 17.5, paragraph II.P.3, states that specific responsibilities within the corrective action program may be delegated, but the applicant or holder maintains

responsibility for the program's effectiveness. Section 16.0, "Corrective Action," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.

43. Draft SRP Section 17.5, paragraph II.P.4, states that the program requires all personnel to identify conditions that are adverse to quality. Section 16.0, "Corrective Action," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.

SECTION 17 QUALITY ASSURANCE (QA) RECORDS

44. Draft SRP Section 17.5, paragraph II.Q.4, states that document access controls, user privileges, and other appropriate security controls must be established. Section 17.0, "Quality Assurance Records," of the AREVA QAPD does not address these criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.
45. Draft SRP Section 17.5, paragraph II.Q.5, states, in part, that design documentation and records include not only the final design documents, such as drawings and specifications, and revisions thereto, but also documentation which identifies the important steps, including sources of design inputs that support the final design. Section 17.0, "Quality Assurance Records," of the AREVA QAPD does not address the documentation which identifies the important steps, including sources of design inputs that support the final design. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
46. Draft SRP Section 17.5, paragraph II.Q.6, states, that the program requires records to be examined for adequacy, legibility and completeness. Section 17.0, "Quality Assurance Records," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
47. Draft SRP Section 17.5, includes Regulatory Issue Summary (RIS) 2000-18 for several criteria related to the storing and maintaining QA records in electronic media including; II.Q.3, II.Q.7, II.Q.9, II.Q.10, II.Q.14, II.Q.15, II.Q.16, II.Q.17, and II.Q.18. Section 17.0, "Quality Assurance Records," of the AREVA QAPD does not address these criteria associated with electronic media. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.

SECTION 18 AUDITS

48. Draft SRP Section 17.5, paragraphs II.R.4 and II.R.8, discusses the contents of the audit report and audit plan, respectively. Section 18.0, "Audits," of the AREVA QAPD does not address these criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.
49. Draft SRP Section 17.5, paragraph II.R.5 discusses the audit process associated with electronic media as referenced in RIS 2000-18. Section 18.0, "Audits," of the AREVA QAPD does not address these criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.

50. Draft SRP Section 17.5, paragraph II.R.10, states that when any work carried out under the requirements of the QA program is delegated to others, the work is audited by the QA audit program. Section 18.0, "Audits," of the AREVA QAPD does not address this criterion. Provide a discussion of the how this criterion applies to activities for the U.S. EPR.
51. Draft SRP Section 17.5, paragraph II.R.11, states, in part, that such audits should be conducted as a minimum on a triennial basis and provides further criteria related to the performance of supplier audits. Section 18.4, "Supplier Audits," of the AREVA QAPD states, in part, that supplier audit frequency is based upon written criteria that incorporate the safety classification, importance, complexity, and quality requirements of the items or services being procured. The AREVA QAPD does not explicitly identify the triennial period for these reviews or address the additional criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.
52. Draft SRP Section 17.5, paragraph II.R.12, discusses criteria associated with the ongoing evaluations of suppliers, and includes a description of acceptable methods for implementing such evaluations including, but not limited to, receipt inspections, operating experience, supplier evaluation programs, and source verifications. Section 18.4, "Supplier Audits," of the AREVA QAPD does not address these criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.
53. Draft SRP, Section 17.5, paragraph II.S, discusses, in part, the training and qualification criteria associated with QA Auditors. Section 18.0, "Audits," of the AREVA QAPD does not address these criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.
54. Draft SRP, Section 17.5 paragraph II.W, "Independent Review," provides a detailed description of those criteria, that are deemed important for the establishment and implementation of independent review activities associated with the fulfillment of the requirements promulgated in Appendix B to 10 CFR Part 50. Section 18.0, "Audits," of the AREVA QAPD does not address these criteria. Provide a discussion of the how these criteria apply to activities for the U.S. EPR.

Appendix B Regulatory Commitments: Compliance with Applicable Regulatory Guides (RGs)

55. Draft SRP, Section 17.5, paragraph II.U.1, lists those RGs and Generic Letters (GLs) applicable to the development and implementation of a quality assurance (QA) program consistent with the requirements promulgated in Appendix B to 10 CFR Part 50, and includes, but is not limited to, GL 89-02, "Actions to Improve the Detection of Counterfeit and Fraudulently Marked Products," and Generic Letter 91-05, "Licensee Commercial-Grade Dedication Programs." Appendix B, "Regulatory Commitments: Compliance with Applicable Regulatory Guides," of the AREVA QAPD does not address theseGL. Provide a discussion of the how these GL apply to activities for the U.S. EPR.

56. Draft SRP, Section 17.5, paragraph II.U.2, lists those standards applicable to the development and implementation of a QA program consistent with the requirements promulgated in Appendix B to 10 CFR Part 50, and includes select subparts to ASME NQA-1-1994 Edition, "Quality Assurance Requirements for Nuclear Facility Applications," and select guidance embodied in Nuclear Information and Records Management Association, Inc. (NIRMA) technical guidelines. Section 0.1.1, "Scope," of the AREVA QAPD states, in part, that this QAP is in compliance with the regulations, codes, standards, and other requirements listed in Section 2.3. The Document is also written to comply with NQA-1-1994. Based on these statements;
- A. Confirm that the AREVA QAP commits to the specific subparts to ASME NQA-1-1994 Edition described in the Draft SRP, Section 17.5, paragraph II.U.2.
 - B. Appendix B, "Regulatory Commitments: Compliance with Applicable Regulatory Guides," of the AREVA QAPD does not address the NIRMA technical guidelines. Provide a discussion of the how these NIRMA technical guidelines apply to activities for the U.S. EPR.
 - C. The reference to "Section 2.3" in Section 0.1.1 of the AREVA QAPD above, is in error. The reference should be to "Section 2.1.3."

Appendix C Definitions

57. The definition of "Commercial Grade Item" contains a duplicated phrase "require in-process," which should be removed.
58. The definition of "Safety Related" is not consistent with the current definition provided in 10 CFR 50.49. The phrase "comparable to guideline exposures of 10 CFR Part 100" should be revised to be consistent with the language in 10 CFR 50.49(b)(1)(i)(c).

Addendum A Non-safety Related Products and Services

59. Draft SRP Section 17.5, paragraph II.V.2 provides criteria that apply to non-safety related SSCs credited for regulated events, including fire protection (10 CFR 50.48), anticipated transient without scram (10 CFR 50.62), and station blackout (10 CFR 50.63). Addendum A, "Non-safety Related Products and Services," of the AREVA QAPD does not address the documents described in the draft SRP regarding the SSCs credited for regulated events. Provide a discussion of the how these documents described in draft SRP, Section 17.5, paragraphs II.V.2.a - c, apply to activities for the U.S. EPR.

U.S. Evolutionary Power Reactor Mailing List

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