

MFFFNPEm Resource

From: Tiktinsky, David
Sent: Wednesday, May 12, 2010 2:03 PM
To: Morrissey, Kevin; Cleavenger, Sabrina; Arroyo, Damaris
Cc: MFFFHearingFile Resource; Oesterle, Eric
Subject: FW: Draft Responses to MPQAP Telecon Questions
Attachments: tech.gif; MOX phone call regarding MPQAP Rev 9 MOX S.doc

Please take a look at this and let me know if it ok. Thanks.

From: Gwyn, Dealis W. [mailto:DWGwyn@moxproject.com]
Sent: Wednesday, May 12, 2010 1:47 PM
To: Tiktinsky, David
Cc: Kehoe, David; Shell, George T.; Justice, Benjamin R.; Yates, Douglas A.
Subject: Draft Responses to MPQAP Telecon Questions

Dave

Attached are draft responses to the questions raised during the telecon on MPQAP Rev 9. As MPQAP Rev 9 has been approved within MOX Services and submitted for NRC approval, MOX Services plans to issue MPQAP Rev 9, Change 1 consistent with the responses. Once we receive confirmation that our responses are acceptable, we will get project approval for MPQAP Rev 9, Change 1 and subsequently submit that version to the NRC. We also submit revised LA to include the update in Chapter 15.

If you have any questions, please let me know.

Dealis

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From: Tiktinsky, David

Created By: David.Tiktinsky@nrc.gov

Recipients:

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Tracking Status: None

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Tracking Status: None

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Questions for MOX phone call regarding Rev. 9 to the MPQAP

1. Why is mention of RG 1.33 only applied in certain sections?
 - (Omitted from Sections 1, 4, 7, 8)

MOX Response: Revised MPQAP to add RG 1.33 to sections 1, 4, 7, 8, 9, 10, 13, 14, 15, & 16.

2. Section 7.2.9, "Receiving Inspection," sets forth requirements for the use of receiving inspections to accept items at the MFFF. As part of Revision 9 to the MPQAP, MOX Services added Subpart F to Section 7.2.9 to discuss supplier evaluations. Although the discussion includes information related to receipt inspections being used as part of evaluations, the content may be more readily understood in the context of the supplier evaluation section. (Reference: NUREG 0800 Part R.12)

MOX Services Response: The numbering of the sections created an apparent inconsistency. Sections 7.2.7 through 7.2.10 should have been subsections to 7.2.6, Acceptance of Items or Services. The MPQAP has been revised to add section 7.2.6.1, General; renumber 7.2.7 through 7.2.10 to 7.2.6.2 through 7.2.6.5; renumber 7.2.11 through 7.13 to 7.2.7 through 7.2.9. This will make the section more closely match the structure of NQA-1 and should clear up the apparent inconsistency.

3. Section 10.2, "Requirements," sets forth the requirements for inspections. As part of Revision 9 to the MPQAP, MOX Services modified this section to state that the inspection activities that will be documented and controlled by instructions, procedures, drawings, checklists and other appropriate means *will be those inspection activities that require qualified inspection personnel*.

Please clarify what is meant by "inspection activities that require qualified inspection personnel."

MOX Services Response: Revised sentence in MPQAP Section 10.2 to

Inspection activities, associated with QL-1 and QL-2 items, require qualified inspection personnel, are documented, and controlled by instructions, procedures, drawings, checklists, travelers or other appropriate means.

4. In Section 18, "Audits" there are various requirements that are not specific to the facility. For example:

- During Operations, the functional areas of an organization's QA program for auditing include at a minimum, verification of compliance and effectiveness of implementation of internal rules, procedures (e.g., operating, design, procurement, maintenance, modification, surveillance, test, security, radiation control procedures, and the emergency plan), Operating Limits Manual, regulations and license conditions, programs for training, retraining, qualification and performance of operating staff, corrective actions, and observation of

performance of operating, maintenance and modification activities, including associated record keeping.

MOX Services Response: Revised MPQAP as follows:

During Operations, the functional areas of the MOX Services organization for auditing include at a minimum, verification of compliance and effectiveness of implementation of internal rules, procedures. The functional areas include:

- *Engineering, Configuration and Modification Control*
 - *Operations*
 - *Maintenance*
 - *Radiation Protection/Radwaste Management*
 - *Chemical/Radiochemical Control*
 - *Procurement & Material Control*
 - *Nuclear Safety*
 - *Environmental Control*
 - *Operating Limits Manual Compliance*
 - *Performance, Training & Qualification*
 - *Corrective Action*
- If more than one purchaser buys from a single supplier, a purchaser may either perform or arrange for an audit of the supplier on behalf of itself and other purchasers to reduce the number of external audits of the supplier. The scope of this audit should satisfy the needs of all of the purchasers, and the audit report should be distributed to all the purchasers for whom the audit was conducted. Each of the purchasers relying on the results of an audit performed on behalf of several purchasers remains individually responsible for the adequacy of the audit.

MOX Services Response: Revised MPQAP as follows:

If more than one purchaser (MOX Services, subsuppliers & other Licensees) buys from a single supplier, MOX Services may either perform or arrange for an audit of the supplier on behalf of itself and other purchasers to reduce the number of external audits of the supplier. The scope of this audit will be verified to satisfy the requirements of the MOX MPQAP, and the audit report will be maintained by MOX Services as a record. MOX Services remains individually responsible for the adequacy of the audit even when performed by others.

5. MOX Services revised Section 3.1 of the MPQAP to add the statement: “Controls are established for the selection and suitability of application of materials, parts, equipment and processes that are essential to the functions of structures, systems and components.”

Section 3, “Design Process,” of Supplement 3S-1 to NQA-1-1994 states that “Design methods, materials, parts, equipment, and processes that are essential to the function of the structure, system, or component shall be selected and reviewed for suitability of application.”

Please clarify why “design methods” was excluded from the MPQAP?

MOX Services Response: Revised MPQAP section 3.1 as follows:

Controls are established for the selection and suitability of application of design methods, materials, parts, equipment and processes that are essential to the functions of structures, systems and components.

6. Please review Chapter 15 of the LA to ensure that the **scope** of the CM program clearly commits to comply with the requirements of 10 CFR 70.72.

§ 70.72, “Facility changes and change process,” states that (a) The licensee shall establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, equipment, components, computer programs, and activities of personnel. This system must be documented in written procedures and must assure that the following are addressed prior to implementing any change: (1) The technical basis for the change; (2) Impact of the change on safety and health or control of licensed material; (3) Modifications to existing operating procedures including any necessary training or retraining before operation; (4) Authorization requirements for the change; (5) For temporary changes, the approved duration (e.g., expiration date) of the change; and (6) The impacts or modifications to the integrated safety analysis, integrated safety analysis summary, or other safety program information, developed in accordance with § 70.62.

MOX Services Response: Added the following sentence to LA 15.2.4 and revised second sentence as follows:

Upon issuance of the MFFF Possession and Use License, the scope of the configuration management program will be consistent with, and support the implementation of, 10 CFR 70.72. Within that scope, configuration management includes IROFS...