MFFFNPEm Resource

From: Tiktinsky, David
Sent: Wednesday, May 05, 2010 3:42 PM
To: Gwyn, Dealis W.
Cc: MFFFHearingFile Resource; Oesterle, Eric; Morrissey, Kevin
Subject: FW: MOX phone call regarding MPQAP Rev 9.doc
Attachments: MOX phone call regarding MPQAP Rev 9.doc

From: Cleavenger, Sabrina
Sent: Wednesday, May 05, 2010 2:51 PM
To: Tiktinsky, David
Cc: Arroyo, Damaris; Oesterle, Eric
Subject: MOX phone call regarding MPQAP Rev 9.doc

Dave,

Here is the document containing the questions discussed during the call with MOX.

Thanks,
Sabrina

Hearing Identifier: MixedOxideFuelFabricationFacility_NonPublic
Email Number: 1696

Mail Envelope Properties (0A64B42AAA8FD4418CE1EB5240A6FED11293D2BA6A)

Subject: FW: MOX phone call regarding MPQAP Rev 9.doc
Sent Date: 5/5/2010 3:42:10 PM
Received Date: 5/5/2010 3:42:13 PM
From: Tiktinsky, David

Created By: David.Tiktinsky@nrc.gov

Recipients:
"MFFFHearingFile Resource" <MFFFHearingFile.Resource@nrc.gov>
Tracking Status: None
"Oesterle, Eric" <Eric.Oesterle@nrc.gov>
Tracking Status: None
"Morrissey, Kevin" <Kevin.Morrissey@nrc.gov>
Tracking Status: None
"Gwyn, Dealis W." <DWGwyn@moxproject.com>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	318	5/5/2010 3:42:13 PM
MOX phone call regarding MPQAP Rev 9.doc	32366	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

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)

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)

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."

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.

    - 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.

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?

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.