

November 10, 2010

Mr. Jim Kinsey
Director, Regulatory Affairs
Next Generation Nuclear Plant Project
Idaho National Laboratory
P.O. Box 1625
2525 North Fremont Ave
Idaho Falls, ID 83415

SUBJECT: NEXT GENERATION NUCLEAR PLANT – QUALITY ASSURANCE PROGRAM
DESCRIPTION FEEDBACK

Dear Mr. Kinsey:

By letter dated August 3, 2010, Idaho National Laboratory, Next Generation Nuclear Plant Project, submitted PDD-172, "Next Generation Nuclear Project Quality Assurance Program Description" for Nuclear Regulatory Commission staff review and feedback in order to facilitate resolution of any issues that may be identified.

The staff has reviewed the document and has initially identified two items of particular interest:

(1) It appears that the applicability of the Quality Assurance Program Description (QAPD) is to all activities, from design up through and including operations. If the intent of the QAPD is to govern all activities, including operations, then the guidance in Regulatory Guide (RG) 1.33 "Quality Assurance Program Requirements (Operation)," should be applied. American Society of Mechanical Engineers (ASME) NQA-1-2008/2009 Addenda "Quality Assurance Requirements for Nuclear Facility Applications," as endorsed in RG 1.28, Revision 4, "Quality Assurance Program Requirements (Design and Construction)" is adequate through the design and construction stages, but is not written to cover operations. To ensure all quality assurance requirements for the operations phase are addressed, an applicant should either demonstrate that its QAPD has incorporated all of the administrative controls by explicitly addressing the provisions in Nuclear Energy Institute (NEI) 06-14, Revision 9 (NEI 06-14A, Revision 7)¹, "Quality Assurance Program Description," Attachment 4, or otherwise by including a commitment to RG 1.33 in the QAPD.

(2) Regarding the use of a graded QA approach for Research and Development (R&D) activities. It is not clear to the staff why this approach is being adopted, why this methodology is only being used for the R&D area, and what, if any, precedent is being followed in developing this methodology.

¹ Nuclear Energy Institute (NEI) 06-14, Revision 9 (NEI 06-14A, Revision 7) is based on American Society of Mechanical Engineers (ASME) NQA-1-1994.

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Additional clarification will be needed in this area.

Should you have questions, please contact Wesley Held at (301) 415-1583 or Wesley.held@nrc.gov.

Sincerely,

/RA/

Joseph F. Williams, Sr. Project Manager
Advanced Reactor Branch 1
Advanced Reactor Program
Office of New Reactors

Project No.: 0748

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