

MFFFPEm Resource

From: Marcano, Jonathan
Sent: Tuesday, April 05, 2011 4:24 PM
To: Tiktinsky, David
Cc: Campbell, Larry; Morrissey, Kevin; Soto, Soly; Arroyo, Damaris; Atack, Sabrina
Subject: Proposed MOX QAPD RAI's
Attachments: RAIs Revision 10 MOXQAPD_04-05-2011.docx; image001.gif

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Dave,

Attached you will find the proposed RAI's for the Rev. 10 of MOX QAPD. Let me know if you have any questions or comments.

Thanks,



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RAIs Revision 10 MOXQAPD_04-05-2011.docx		25319
image001.gif	1328	

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MOX Request of Additional Information on Draft Revision 10 of the MPQAP

Section 2 Quality Assurance Program

1. Provide justification of why the proposed clarification in Section 2.1.1, third paragraph (and note that this extend to Attachment A of the MPQAP) is consistent with the requirements of ASME NQA-1-1994, as revised by the ASME NQA-1a 1995 Addenda.

The regulation, 10 CFR Part 70.22(f), requires that the applicant describe the QA program to be applied to the design, fabrication, construction, testing, and operation of the structures, systems, and components of the facility. The footnote of § 70.22(f) states that the description of the QA program should include a discussion of how the criteria in Appendix B of 10 CFR Part 50 will be met.

Proposed clarification to Section 2.1.1, "Program Basis" and "Attachment A" of the MPQAP states that "Where alternatives due to a later edition of a code or standard than that identified in Part II or when that identified in Part II has been cancelled or superseded a change in the MPQAP is not required if the change only addresses the method for implementing the specific requirement. The change shall be identified in project procedures and specifications." This clarification is not consistent with the requirements of ASME NQA-1-1994, as revised by the ASME NQA-1a 1995 Addenda as described in section 7 of the introduction to NQA-1 Part II (Part II), "Referenced Codes, Standards, and Specifications." This section states in part that "Users of this part (Part II) should review the acceptability of the date or edition to be referenced with the regulatory and enforcement authorities having jurisdiction at the nuclear facility."

Attachment A: Commitment to Quality Assurance Standards

1. Provide a sample of the data used to support the conclusion that the fill materials used at MOX shows a well defined moisture-density relationships.

The regulation, 10 CFR Part 70.22(f), requires that the applicant describe the QA program to be applied to the design, fabrication, construction, testing, and operation of the structures, systems, and components of the facility. The footnote of § 70.22(f) states that the description of the QA program should include a discussion of how the criteria in Appendix B of 10 CFR Part 50 will be met.

Proposed exception to "Attachment A" of the MPQAP provides a justification to take exception to section 5.2 (c) of ASME NQA-1-1994, as revised by the ASME NQA-1a 1995 Addenda Part II. However the applicant has not provided any data to support its conclusion that fill materials used at MOX shows a well defined moisture-density relationships.

2. Provide a clarification of the validation process used to accept a backfill plan.

3. Please clarify if the description of the equipment required in the backfill plan will include details about equipment weight.

DRAFT

