

MFFFNPEm Resource

From: Tiktinsky, David
Sent: Wednesday, April 20, 2011 10:00 AM
To: Gwyn, Dealis W.
Cc: MFFFHearingFile Resource; Morrissey, Kevin; Gloersen, William; Shannon, Mel
Subject: FW: Last Rev MOX QA
Attachments: RAIs Revision 10 MOXQAPD_04-06-2011.docx; image001.gif

I have attached the draft RAI's for our tentative May 17 meeting on the QA plan Rev. 10

From: Marcano, Jonathan
Sent: Wednesday, April 13, 2011 4:12 PM
To: Tiktinsky, David
Cc: Campbell, Larry
Subject: Last Rev MOX QA

Dave,

As mentioned in the BM, I think we should move forward with your recommendation of having a call to discuss the RAIs with MOX. Then we can determine the need to modify the text in the RAIs.



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Hearing Identifier: MixedOxideFuelFabricationFacility_NonPublic
Email Number: 1937

Mail Envelope Properties (0A64B42AAA8FD4418CE1EB5240A6FED126A3022EA2)

Subject: FW: Last Rev MOX QA
Sent Date: 4/20/2011 9:59:51 AM
Received Date: 4/20/2011 9:59:50 AM
From: Tiktinsky, David

Created By: David.Tiktinsky@nrc.gov

Recipients:

"MFFFHearingFile Resource" <MFFFHearingFile.Resource@nrc.gov>
Tracking Status: None
"Morrissey, Kevin" <Kevin.Morrissey@nrc.gov>
Tracking Status: None
"Gloersen, William" <William.Gloersen@nrc.gov>
Tracking Status: None
"Shannon, Mel" <Mel.Shannon@nrc.gov>
Tracking Status: None
"Gwyn, Dealis W." <DWGwyn@moxproject.com>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

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MESSAGE	653	4/20/2011 9:59:50 AM
RAIs Revision 10 MOXQAPD_04-06-2011.docx		23812
image001.gif	1328	

Options

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

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

Section 2 Quality Assurance Program

1. Provide justification of how the proposed changes in the third paragraph of Section 2.1.1 and the first paragraph of Attachment A of the MPQAP, are consistent with the provisions 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.

The proposed change to Section 2.1.1, "Program Basis," and Attachment A of the MPQAP includes the following statement, "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." The justification provided for this change does not provide an adequate technical basis for the use of alternative codes and standards and is not consistent with the provisions of 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 the Mixed Oxide Fuel Fabrication Facility (MFFF) show 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.

The 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, this justification does not include any data to support the conclusion that fill materials used at MOX show well defined moisture-density relationships.

2. Provide a description in the MPQAP of the validation process used to accept a backfill plan.
3. Clarify in the MPQAP, if the description of the equipment required in the backfill plan will include details about equipment weight.

