

Westinghouse Electric Company LLC  
Talking Points for Pre-Application  
Meeting  
Regarding Graded Quality  
Assurance  
April 4, 2013

- (1) During license renewal in 2007, Westinghouse Electric Company LLC (WEC) voluntarily committed to a Quality Assurance (QA) Program described in Section 3.3 of the SNM-1107 License Application. A graded approach is used to implement this program.
- “Crucial to safety” systems (i.e., a control whose failure results in a high consequence event) receive full application of the 18 QA program requirements.
  - “Important to safety” systems (i.e., a control whose failure results in an intermediate consequence event or a loss of Double Contingency Protection) receive selective application of the QA program requirements.
  - Defense in depth controls do not require specific application of QA and are installed, operated and maintained in accordance with industry practice.

- (2) Designation of the level of Quality Assurance per this graded approach is performed per Table 4.3 “Risk Evaluation Table” in Section 4.1.1.7 of the SNM-1107 License Application.
- (3) During the license renewal process, discussions were held with NRC to explain WEC’s defense in depth design philosophy which is to have at least two IROFS for each high or intermediate consequence accident scenario (i.e., no sole IROFS). One reference to these discussions is in WEC Letter LTR-RAC-06-40, Westinghouse SNM-1107 License Renewal Request for Additional Information Responses (TAC 31911) dated May 12, 2006.

- (4) Implementation of this system has been the Westinghouse policy and practice since formal establishment of the QA program in 2007.
- (5) Due to involved language describing the graded approach in the existing License Application, Westinghouse received a Level IV violation on 1/29/13 for failure to ensure criticality safety IROFS received the full application of the QA program requirements.
- (6) WEC submitted a License Amendment request on 1/30/13 to clarify the intent and applicability of the EH&S QA Program.
- (7) WEC withdrew this License Amendment request on 3/12/13 because it needed more background to be readily understood.
- (8) This meeting today is for WEC to understand NRC's expectations for re-submittal of this License Amendment request.