

August 18, 2014

Mr. Jerald G. Head
Senior Vice President, Regulatory Affairs
GE-Hitachi Nuclear Energy
P.O. Box 780 M/C A-18
Wilmington, NC 28401

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: GENERAL ELECTRIC
HITACHI (GEH) QUALITY ASSURANCE TOPICAL REPORT NEDO-11209, "GE
HITACHI NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM
DESCRIPTION," REVISION 11, MARCH 2014 (TAC NO. MF3792)

Dear Mr. Head:

By letter dated March 31, 2014 (Agencywide Documents Access and Management System Accession No. ML14090A330), GEH submitted for U.S. Nuclear Regulatory Commission (NRC) staff review, Topical Report NEDO-11209, "GE Hitachi Nuclear Energy Quality Assurance Program Description," Revision 11. Upon review of the information provided, the NRC staff has determined that additional information is needed to complete the review. On August 18, 2014, James Harrison, GEH, Vice President for Fuel Licensing, and I agreed that the NRC staff will receive your response to the enclosed Request for Additional Information (RAI) questions by August 29, 2014. If you have any questions regarding the enclosed RAI questions, please contact me at 301-415-1002.

Sincerely,

/RA/

Joseph A. Golla, Project Manager
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 710

Enclosure:
As stated

cc: See next page

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**REQUEST FOR ADDITIONAL INFORMATION REGARDING
NEDO-11209, REVISION 11, "GE HITACHI NUCLEAR ENERGY QUALITY
ASSURANCE PROGRAM DESCRIPTION"
PROJECT NO. 710**

1. In January 2011, the U.S. Nuclear Regulatory Commission (NRC) staff approved NEDO-11029, "GE Hitachi Quality Assurance Program Description," Revision 9. In March 2014, General Electric Hitachi (GEH) submitted Revision 11 to the NRC, but did not submit Revision 10. GEH provided Enclosure 2, "Roadmap for NEDO-11209, Revision 11," which covered NEDO-11209, Revision 9 mapping to Revision 10 and 11. In the Table, the NRC staff identified five changes made in NEDO-11209, Revision 10, Section 1.1, Section 1.4.2.2, Section 1.4.3.1, and Section 18.4. The NRC staff requests that GEH verify that these are all the changes made to the NRC approved NEDO-11209, Revision 9, that were incorporated into NEDO-11209, Revision 10. The staff's purpose is to verify that GEH's Revision 10 of the Quality Assurance Program Description (QAPD) remained acceptable in accordance with Title 10 of the *Code of Federal Regulation* (10 CFR) 50.4(b)(7)(ii).

2. In the GEH QAPD, Part II, "QAPD Details," changes were made to Section 2.0, "QUALITY ASSURANCE PROGRAM," Subsection 2.8, "Quality Assurance Program Description Management," Item 1, to read as follows:

"Changes that are made to the QAPD that are a reduction in commitment are submitted to the US NRC for review and approval per 10 CFR 50.4(b)(7)(ii)."

The requirements of 10 CFR 50.4(b)(7)(ii) for changes to a vendor's QA program do not permit vendors to evaluate whether or not changes to an NRC approved QAPD are reductions in commitment. The NRC staff requests that GEH clarify its process of evaluating potential reductions in commitment.

3. The NRC staff determined that GEH did not make a commitment to the American Society of Mechanical Engineers NQA-1-2008/2009a, Subpart 2.7, "Quality Assurance Requirements of Computer Software for Nuclear Facility Applications." The staff requests clarification on the applicability of Subpart 2.7 to GEH's quality activities.

ENCLOSURE