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U.S. Nuclear Regulatory Commission
Washington, DC 20555

DCS-NRC-000389
9 February 2015

Subject: Docket Number 70-03098
CB&I AREVA MOX Services
Mixed Oxide Fuel Fabrication Facility
Submittal of Justification for Revision 14 of the MOX Project Quality
Assurance Plan

RE: DCS-NRC-000383, letter from David Del Vecchio to U.S. Nuclear Regulatory
Commission, dated January 16, 2015, Submittal of Revision 14 of the MOX
Project Quality Assurance Plan

CB&I AREVA MOX Services, LLC (MOX Services) hereby submits to the U.S. Nuclear
Regulatory Commission (NRC) the justification for the administrative changes that were deemed
to reduce prior commitments as detailed in Revision 14 of the MOX Project Quality Assurance
Plan (MPQAP).

If you have any questions, please feel free to contact me at (803) 442-6485 or Dealis
Gwyn, Licensing and Nuclear Safety Manager at (803) 819-2780.

Sincerely,



David Del Vecchio
President and Project Manager

DCS-NRC-000389

9 February 2015

Page 2 of 2

Enclosure:

Justification for MPQAP, Revision 14

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EDMS: Corresp\Outgoing\NRC\2015 NRC

Enclosure

Justification for MPQAP, Revision 14

Justification for MPQAP Revision 14

MPQAP Revision 14 was submitted to the NRC for review and approval (DCS-NRC-000383, January 16, 2015) as it included two items that MOX Services has determined reduce prior MPQAP commitments. Supporting justification for these changes is provided below.

Change – Delete 9.2.1.C (List of Special Processes)

Change: Section 9.2.1.C requires that a list of special processes be established and maintained based on the special processes criteria provided in Section 9.2.1.B. In MPQAP Revision 14, MOX Services proposes to delete Section 9.2.1.C as a MPQAP commitment.

Rationale: Section 9.2.1.C currently requires the development and maintenance of a “list” of special processes that MOX Services will perform. Section 9.2.1.B provides the criteria for processes that will be controlled as special processes. The key commitment is the controlling of processes that meet the criteria of a special process. A list of special processes is a tool that can assist MOX Services in assuring compliance with Section 9.2.1.B; however, other options may be available that may not be recognized as lists (use of tracking media) such that the current commitment is overly prescriptive. Examples of processes that MOX Services has determined meets the criteria of special processes are included in the second paragraph of Section 9, *Control of Special Processes*. In addition, quality affecting activities, including special processes, are performed in accordance with documented, approval QA procedures as discussed in with Section 5, *Instructions, Procedures and Drawings*.

Deletion of Section 9.2.1.C does not impact the quality or control of special processes. A review of ASME NQA-1-1994 thru 1995a and Standard Review Plan (NUREG 1718) did not identify a requirement to maintain a “list” of Special Processes.

Change - Delete Section 18.2.1.E (Nuclear Criticality Safety Audits)

Change – Section 18.2.1.E requires nuclear criticality safety audits at least every two years. In MPQAP Revision 14, MOX Services proposes to delete Section 18.2.1.E as a MPQAP commitment.

Rationale: This section currently requires nuclear criticality safety audits at least once every two years. This is duplicative of information already in Chapter 6 of the License Application (LA), which states “As a minimum, regularly scheduled internal audits of the NCS functional area quality-affecting activities shall be performed at least once every two years.” In addition, Section 18.2.1.A states “During the Design and Construction phases regularly scheduled internal audits of each MOX Services functional area quality-affecting activities shall be performed

annually. The frequency for audits of operational phase IROFS related activities will be based on the safety significance of the activity and performance history so that each area is evaluated annually (Assessment or Audit) and audited at least once every two years.”

Deletion of Section 18.2.1.E only eliminates duplication of a project commitment as it is discussed in LA Chapter 6, *Nuclear Criticality Safety*. A review of ASME NQA-1-1994 thru 1995a and Standard Review Plan (NUREG 1718) did not identify a requirement to include specific audits and frequencies in the MPQAP.