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U.S. Nuclear Regulatory Commission
Washington, DC 20555

DCS-NRC-000394
15 June 2015

Subject: Docket Number 070-03098
CB&I AREVA MOX Services
Mixed Oxide Fuel Fabrication Facility
Submittal of MOX Project Quality Assurance Plan (MPQAP) Amendment
Number: MPQAP-2015-0001 Rev 01

RE: NRC-DCS-000735, letter from David Tiktinsky to Dealis Gwyn, dated June 11, 2015, Request for Additional Information regarding the review of Amendment Number: MPQAP-2015-0001 for the Mixed Oxide Fuel Fabrication Facility

CB&I AREVA MOX Services, LLC (MOX Services) hereby submits to the U.S. Nuclear Regulatory Commission (NRC) for review and approval Amendment Number: MPQAP-2015-0001 Rev 01, of the MPQAP. The revised MPQAP amendment was developed in response to the referenced NRC Request for Additional Information (RAIs) regarding MPQAP-2015-0001. Also, included are the responses to the subject RAIs (Enclosure 2).

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-000394

15 June 2015

Page 2 of 2

Enclosures:

- (1) MOX Project Quality Assurance Plan Amendment Number: MPQAP-2015-0001 Rev 01
- (2) MOX Services Response to Request for Additional Information regarding Amendment Number: MPQAP-2015-0001

cc (w/encl):

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cc (w/o encl.):

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EDMS: Corresp\Outgoing\NRC\2015 NRC

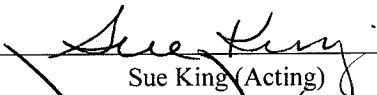
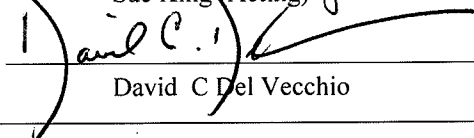
Enclosure 1

**MOX Project Quality Assurance Plan,
Amendment Number: MPQAP-2015-0001, Rev 01**

MOX Project Quality Assurance Plan (MPQAP)

AMENDMENT

Docket No. 070-03098

Amendment No.: MPQAP-2015-0001, Rev.01	NRC Approval Required
Approvals	
VP Project Assurance: <u></u> Date: <u>11 Jun 15</u> Sue King (Acting)	
MOX Services President: <u></u> Date: <u>11 JUN 15</u> David C Del Vecchio	
Current Wording: Section 7.2.2.C 4)	Revised Wording: Section 7.2.2.C 4)
<p>4) Verification that suppliers of calibration services have accreditation by the National Voluntary Laboratory Accreditation Program (NVLAP), the American Association for Laboratory Accreditation (A2LA) or other accreditation agencies accepted as signatories to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA). The following additional requirements shall be noted in procurement documents;</p> <ul style="list-style-type: none"> • Purchase document impose additional technical and administrative requirements to satisfy necessary QA program and technical requirements, • Purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance, • Purchase documents require identification of the laboratory equipment/standards used. <p>The alternative method is limited to the domestic calibration service suppliers.</p>	<p>4) Verification that suppliers of calibration and testing services from domestic and international calibration and testing laboratories are accepted as signatories to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) in lieu of a commercial grade survey. A documented review of the supplier's accreditation is performed to verify:</p> <ul style="list-style-type: none"> • The calibration or test laboratory holds accreditation by an accredited body recognized by the ILAC MRA. The accreditation encompasses ISO/IEC 17025:2005, "General Requirements for the Competence of Testing and Calibration Laboratories." • For calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges and uncertainties. • For testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty. <p>The following additional requirements shall be noted in procurement documents;</p>

MOX Project Quality Assurance Plan (MPQAP) AMENDMENT

Docket No. 070-03098

- Certification by the laboratory that the service has been provided in accordance with their ISO/IEC 17025:2005 accredited program and scope of accreditation.
- Purchase document impose additional technical and administrative requirements to satisfy necessary QA program and technical requirements.
- Purchase documents require **the certificate of calibration to include the** as-found calibration data when calibrated items are found to be out-of-tolerance (calibration services only),
- Purchase documents require **the certificate of calibration to include the** identification of the laboratory equipment/standards used (calibration services only).
- MOX Services must be notified of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.

The receipt inspection will validate that the laboratory's documentation certifies the contracted Calibration or test service has been performed in accordance with their ISO/IEC-17025:2005 program, and been performed within the scope of the accreditation; and the purchase order's requirements are met.

Justification:

Revised to implement guidance endorsed by the NRC in February 9, 2015 SER to Nuclear Energy Institute "Final Safety Evaluation for Technical Report NEI 14-05, "Guidelines for the use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1".

Enclosure 2

**MOX Services Response to Request for Additional Information Regarding
Amendment Number: MPQAP-2015-0001**

MOX SERVICES RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING AMENDMENT NUMBER: MPQAP 2015-0001

NRC RAI 1- *Bullets 3 and 4 in the section containing “additional requirements shall be noted in procurement documents”*

The conditions stated the NRC Final Safety Evaluation Report on the review of NEI 14-05, dated February 9, 2015 (ML14322A5350), in which the amendment was based on, refers to the following: a) as-found calibration data must be reported in the certificate of calibration when calibrated items are found to be out-of-tolerance (for calibration services only) and b) that equipment/standards used to perform the calibration must be identified in the certificate of calibration (for calibration services only).

However, the referenced section of the amendment request does not include any discussion of the “certificate of calibration” but instead only refers to the purchase documents. Please revise the request to include the “certificate of calibration” conditions from the NRC FSER on NEI-14-05, or provide a justification of why the references to purchase documents are equivalent to those conditions.

MOX Services RAI Response

MOX Services has revised bullets 3 and 4 under “additional requirements shall be noted in procurement documents” to refer to the certificate of calibration.

NRC RAI 2- *Please describe in Section 7.2.2.C4 of the MPQAP how it is validated, at receipt inspection, that the laboratory’s documentation certifies that:*

- a. The contracted calibration or test service has been performed in accordance with their ISO/IEC-17025:2005 program, and has been performed within their scope of accreditation; and*
- b. The purchase order’s requirements are met.*

This condition is part of the conditions of approval from the NRC FSER on NEI-14-05.

MOX Services RAI Response

MOX Services has revised Section 7.2.2.C4 to state that the receipt inspection will validate that the laboratory’s documentation certifies (a) the contracted Calibration or test service has been performed in accordance with their ISO/IEC-17025:2005 program, and been performed within the scope of the accreditation; and (b) the purchase order’s requirements are met.

Editorial Comments

NRC RAI 3 - *Please confirm that the section referenced in the amendment request is Section 7.2.2.C4 not 7.2.2.D4 stated in the amendment request.*

MOX Services RAI Response

MOX Services has revised Section reference to 7.2.2.C4.

NRC RAI 4 - *In the introductory paragraph, please clarify that verification is performed to confirm that suppliers of calibration and testing services from domestic and international calibration and testing laboratories [are] accepted as signatories to the International Laboratory Accreditation Cooperation Mutual Recognition Arrangement in lieu of a commercial grade survey.*

MOX Services RAI Response

MOX Services has inserted “are” into the introductory paragraph regarding verification that suppliers of calibration and testing services from domestic and international calibration and testing laboratories are accepted as signatories to the ILAC MRA.