September 1, 2017

Mr. Randall L. Kurtz Quality Assurance Director Sargent & Lundy, LLC 55 East Monroe Street Chicago, IL 60603-5780

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: SARGENT & LUNDY, LLC NUCLEAR QUALITY ASSURANCE PROGRAM TOPICAL REPORT SL-TR-1, REVISION 24 (CAC NO. MF9811)

Dear Mr. Kurtz:

By letter dated May 22, 2017 (Agencywide Documents Access and Management System Accession Number ML17158B238), Sargent & Lundy, LLC (S&L) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review and approval an updated, S&L "Nuclear Quality Assurance Program," Topical Report (TR) SL-TR-1, Revision 24. Upon review of the information provided, the NRC staff has determined that additional information is needed to complete the review. On August 18, 2017, we agreed that the NRC staff will receive the response to the enclosed request for additional information (RAI) questions within 30 days from the date of this letter.

If you have any questions regarding the enclosed RAI questions, please contact me at 301-415-2375.

Sincerely,

/RA/

Leslie Perkins, Project Manager Licensing Processes Branch Division of Policy and Rulemaking Office of Nuclear Reactor Regulation

Enclosure: As stated

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#### **REQUEST FOR ADDITIONAL INFORMATION**

#### RELATED TO NUCLEAR QUALITY ASSURANCE PROGRAM

#### TOPICAL REPORT SL-TR-1, REVISION 24

#### SARGENT & LUNDY, LLC

#### CAC NO. MF9811

#### <u>RAI-1</u>

As required by Title 10 of the *Code of Federal Regulations* (10 CFR) 50.4(b)(7), "Quality assurance [(QA)] related submissions. (i) A change to the Safety Analysis Report quality assurance program description under § 50.54(a)(3) or § 50.55(f)(3), or a change to a licensee's NRC [U.S. Nuclear Regulatory Commission]-accepted quality assurance topical report under § 50.54(a)(3) or § 50.55(f)(3), must be submitted to the NRC's Document Control Desk...." These specific requirements under 10 CFR 50.4 are not applicable to Sargent and Lundy, LLC (S&L).

The changes to SL-TR-1 were submitted to the NRC in accordance with 10 CFR 50.4 (b)(7)(ii), "A change to an NRC-accepted quality assurance topical report from non-licensees (i.e., architect/engineers, NSSS suppliers, fuel suppliers, constructors, etc.) must be submitted to the NRC's Document Control Desk. If the communication is on paper, the signed original must be sent."

The last paragraph of Chapter 00.00, "Introduction," states, in part, that "The examples given in 10 CFR 50.54(a)(3) of changes in licensees' QA program descriptions, that do not require prior NRC approval, are also applicable to this Topical Report [(TR)]. Those changes, that do not require prior NRC approval, must be submitted to the NRC at intervals of no greater than two years."

Changes to non-licensees QA TR (i.e., architect/engineers, NSSS suppliers, fuel suppliers, constructors, etc.) is delineated in 10 CFR 50.4. Clarify why S&L is applying the requirements of 10 CFR 50.54(a)(3) to SL-TR-1.

#### <u>RAI-2</u>

As required by 10 CFR 50.34(f)(3(iii)(H), the QA role in design and analysis is limited to review and approval of design documents by an individual knowledgeable and qualified in QA to ensure the documents contain the necessary QA requirements.

The QA Manager responsibilities and functions in Chapter 01.00, "Organization," Section 01.01 of the TR states, in part, that the responsibilities and functions of the QA Manager include, but are not limited to: "reviewing software verification and validation documentation." In the proposed change from Revision 23 of SL-TR-1A to Revision 24 it is not clear the type of software that is now being assigned to the QA Manager for his/her review of verification and validation of documentation. Also it is not clear what are the roles and responsibilities of the QA Manager with respect to the review of verification and validation of documentation.

Clarify the function of the QA Manager with respect to the verification and validation of software documentation.

### **REFERENCE:**

1. Sargent & Lundy Nuclear Quality Assurance Program Topical Report SL-TR-1, Revision 24, May 2017 (ADAMS Accession No. ML17158B239).