

Mazza, Jan

From: Mazza, Jan
Sent: Tuesday, October 24, 2017 10:50 AM
To: 'C Cochran'
Cc: Segala, John; Kavanagh, Kerri (Kerri.Kavanagh@nrc.gov); Lamb, Taylor
Subject: Typographical errors or inadvertent additions/omissions in the Oklo QAPD Topical Report

Caroline,

I signed the letter transmitting the final version of the RAIs this morning. You should be receiving them in the next few days. I also mentioned that I would be sending a list of typographical errors or inadvertent additions/omissions that the NRC staff identified during its review of the Oklo QAPD Topical Report. I am sending these to you separate from the RAIs since NRC is not asking for a written response to these, rather we are asking Oklo to address these items when revising the QAPD Topical Report.

1. In Section 3.5 (page 15 of 42) of the NQA-1 commitment section, the applicable section of Requirement 3 is omitted. Revising the text to read "...Requirement 3, Sections 100 through 900, and Subpart 2.7" would be consistent with the rest of the QAPD.
2. Section 7.2 (Page 22 of 42), "NQA-1 Commitment / Exceptions," of the Oklo QAPD describes an exception to NQA-1-2008 and NQA-1a-2009 Addenda for purchasing commercial-grade calibration services. One of the bullets discusses that "the accreditation encompasses the American Nuclear Society/International Standardization Organization/International Electrotechnical Commission (ANS/ISO/IEC) 17025, 'General Requirements for the Competence of Testing and Calibration Laboratories.'" However, the specific date associated with ANS/ISO/IEC 17025 was not addressed. The NRC staff has only approved the use of the 2005 edition of ANS/ISO/IEC 17025.
3. In Section 7.2 (page 22 of 42), "NQA-1 Commitment / Exceptions," of the Oklo QAPD, Oklo commits to compliance with "NQA-1-2008 and NQA-1a-2009, Requirement 7, Sections 100 through 800," with several clarifications and exceptions. Verify that this is the appropriate method for referencing the 2009 Addenda to NQA-1-2008, and ensure consistency with the rest of the Oklo QAPD.

4. In Section 7.2 (page 22 of 42), “NQA-1 Commitment / Exceptions,” of the Oklo QAPD the first bullet reads as “NQA-1-2008, NQA-1a, 2009.” Similarly, the reference is used at the bottom of page 22 of 42 and for the bullet on page 23 of 42. Verify that this is the appropriate method for referencing the 2009 Addenda to NQA-1-2008, and ensure consistency with the rest of the Oklo QAPD.
5. Regarding the clarification/exception to NQA-1-2008 and NQA-1a-2009 Addenda, Sections 200 and 503(f) (page 22 of 42), the Oklo QAPD discusses a number of conditions that need to be met when procurement source evaluations and selection measures are not performed. Specifically, a bullet discussing accrediting bodies recognized by the International Laboratory Accreditation Cooperation are detailed. However, the six bullets that follow had not been sub-bulleted to adequately clarify the accrediting bodies. Indent to adequately characterize the accrediting bodies such that it is consistent with the rest of the clarification/exception.
6. In Section 7.2 (page 23 of 42), “NQA-1 Commitment / Exceptions,” of the Oklo QAPD, it states a clarification regarding NQA-1-2008, NQA-1a-2009 Addenda, Requirement 7, Section 700. The section specifically states, in part, “in establishing commercial grade item requirements, Oklo commits to compliance with NQA-1a-2009, Section 700 and Subpart 2.14...” However, the Oklo QAPD does not discuss Subpart 2.14 in any other location in the document. To be consistent with the rest of the document, ensure that NQA-1a-2009 Addenda, Subpart 2.14 is also properly referenced in a more prominent location.
7. In Section 11.1 (page 28 of 42), “NQA-1 Commitment for Computer Program Testing” of the Oklo QAPD, Oklo commits to compliance with “NQA-1a-2009, Requirement 11, Section 400, and Subpart 2.7.” Verify that this is the appropriate method for referencing the 2009 Addenda to NQA-1-2008, and ensure consistency with the rest of the Oklo QAPD.
8. In Section 11.2 (page 28 of 42), “NQA-1 Commitment” of the Oklo QAPD, Oklo commits to compliance with “NQA-1a-2009, Requirement 11, Sections 100 through 600.” Verify that this is the appropriate method for referencing the 2009 Addenda to NQA-1-2008, and ensure consistency with the rest of the Oklo QAPD.
9. In Section 16.2 (page 33 of 42), “NQA-1 Commitment,” the applicable section of Requirement 16 is omitted. Revising the text to read “...Requirement 16, Section 100” would be consistent with the rest of the QAPD.
10. Section 17.1 (page 34 of 42), “Record Retention,” of the Oklo QAPD discusses that sufficient records of completed items and activities affecting quality are properly stored. Specifically, it states that “...records and retention times are based on Regulatory Position C.1 as applicable for the DC Project.” Revising to read “...records and retention times are based on Regulatory Position C.1 of Regulatory Guide 1.28, Revision 4, as applicable for the DC Project” would provide clarification where the Regulatory Position is stated and would be consistent with the rest of the QAPD.
11. At the bottom of page 35 of 42, in Section 18.1, “Performance of Audits,” of the Oklo QAPD it states: “Audits of Suppliers of safety-related components and/or services are conducted as described in Section 7.1.” To provide clarification and be consistent with the rest of the QAPD, revise as follows, or similar phrasing: “Audits of Suppliers of safety-related components and/or services are conducted as described in Section 7.1 of this document.”

Thanks - Jan

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