



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 17 1979

pon

FCTC:RHO
71-0248

Monsanto Research Corporation
ATTN: Mr. Robert R. Taylor
P.O. Box 8, Station B
Dayton, OH 45407

Gentlemen:

This refers to your application dated August 31, 1979 requesting approval of your Quality Assurance (QA) program as meeting the QA program requirements of 10 CFR §71.51.

In connection with our review, we need the information identified in the enclosure to this letter. Please submit seven copies of your response to the enclosed request for additional information within 30 days following receipt of this letter.

If you have any questions regarding this request, please contact Mr. Jack Spaul at (301) 492-7741.

Sincerely,

A handwritten signature in cursive script that reads "Charles E. MacDonald".

Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and Material
Safety, NMSS

Enclosure:
Request for Additional
Information

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MONSANTO RESEARCH CORPORATION (71-0248)

Request for Additional Information

1. In part 3.6, extend the exclusion of the designer's performing design verification to the designer's supervisor. As part of normal line management, we believe a designer's supervisor should evaluate the designer's work performance. This, however, should not be considered the independent design verification we require unless
 - a) The justification is individually documented and approved in advance by the supervisor's management, and
 - b) Audits (Section 3.16) cover frequency and effectiveness of the use of a supervisor as a design verifier to guard against abuse.

Provide a commitment to either use these controls or simply to perform design verification by a qualified individual other than the designer and the designer's supervisor.

2. In part 18.4, the audit periodicity of "no less often than every 18 months" is unacceptable. We require an audit as described in part 18 at least once every year that activities covered by the manual are performed. Provide such a commitment.

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