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Docket No. 70-1308

MEMORANDUM FOR: Leland C. Rouse, Chief
Advanced Fuel and Spent Fuel Licensing Branch
Division of Fuel Cycle and Material Safety

FROM: L. Leonard Gordon
Advanced Fuel and Spent Fuel Licensing Branch
Division of Fuel Cycle and Material Safety

SUBJECT: QUALITY ASSURANCE (QA) INPUT TO THE SAFETY EVALUATION
REPORT (SER) APPLICABLE TO OPERATIONS AT THE
GENERAL ELECTRIC MORRIS SPENT FUEL SERVICES OPERATION

In support of General Electric Company's request for renewal of
SNM-1265, attached is my input to the overall Safety Evaluation Report.

LS

L. Leonard Gordon
Advanced Fuel and Spent Fuel
Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosure:
Quality Assurance Plan

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DATE	5/9/80	5/14/80			

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SAFETY EVALUATION REPORT
SPENT FUEL SERVICES OPERATION
QUALITY ASSURANCE PLAN

QUALITY ASSURANCE

GENERAL

The description of the quality assurance (QA) program for General Electric (GE) Spent Fuel Services Operation (SFSO) is contained in documents NEDO-20776 dated July 1975, NEDO-20766-1, dated September 1975, NEDO-20776-2 dated May 1976, and NEDO 20776-3 dated July 14, 1978. Our evaluation of this QA program applicable to operations at the General Electric Morris nuclear fuel storage facility, is based on a detailed review of this information and response to questions pertinent to their QA plan submitted to GE on February 28, 1980. The plan was reviewed against the requirements set forth in Appendix B to 10 CFR Part 50, "QA Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," and proposed Revision 3 to Regulatory Guide 1.33, "QA Program Requirements for Operations."

ORGANIZATION

The organizational structure responsible for the establishment and execution of the QA program for the SFSO is shown in Figure 1. The Manager of SFSO, who has the overall responsibility for engineering services and regulatory operations for the Morris facility, has delegated the authority for implementation and control of the QA program to the Manager of QA.

The Morris Operation Organization is shown in Figure 2. The Manager of Quality Assurance and Safeguards, who reports to the Morris Operation Manager, is responsible for directing and managing the QA program at the site. Both

QA organizations have authority delegated in writing from the manager SFSO and freedom to identify quality problems; initiate, recommend or provide solutions; and verify implementation of solutions. The QA personnel shown in Figure 3 and assigned to the Morris Operation is sufficient to support the level of activity expected at the site.

The SFSO QA organization is given responsibility for: establishing requirements (e.g., hold points, inspection, documentation) for verification of quality; reviewing and approving quality related documents (e.g., instructions, procedures, drawings, and specifications); verifying by test or inspection that quality requirements are met for materials, components, processes and plant modifications; documenting and reporting to responsible management any nonconformances discovered in the course of inspection, surveillance or audit; assuring corrective actions are effective and accomplished in a timely manner; and surveillance and auditing of maintenance, repair and operation activities.

QA PROGRAM

The QA program for operations at the Morris nuclear fuel storage facility implements the requirements of GE's corporate and division quality policies via Quality Standing Instructions (QSI) and Implementing Procedures (IP).

The QSI and IP, which are reviewed and approved by the Manager of QA, encompass detailed quality instructions for translating codes, standards, regulatory requirements, and technical specifications.

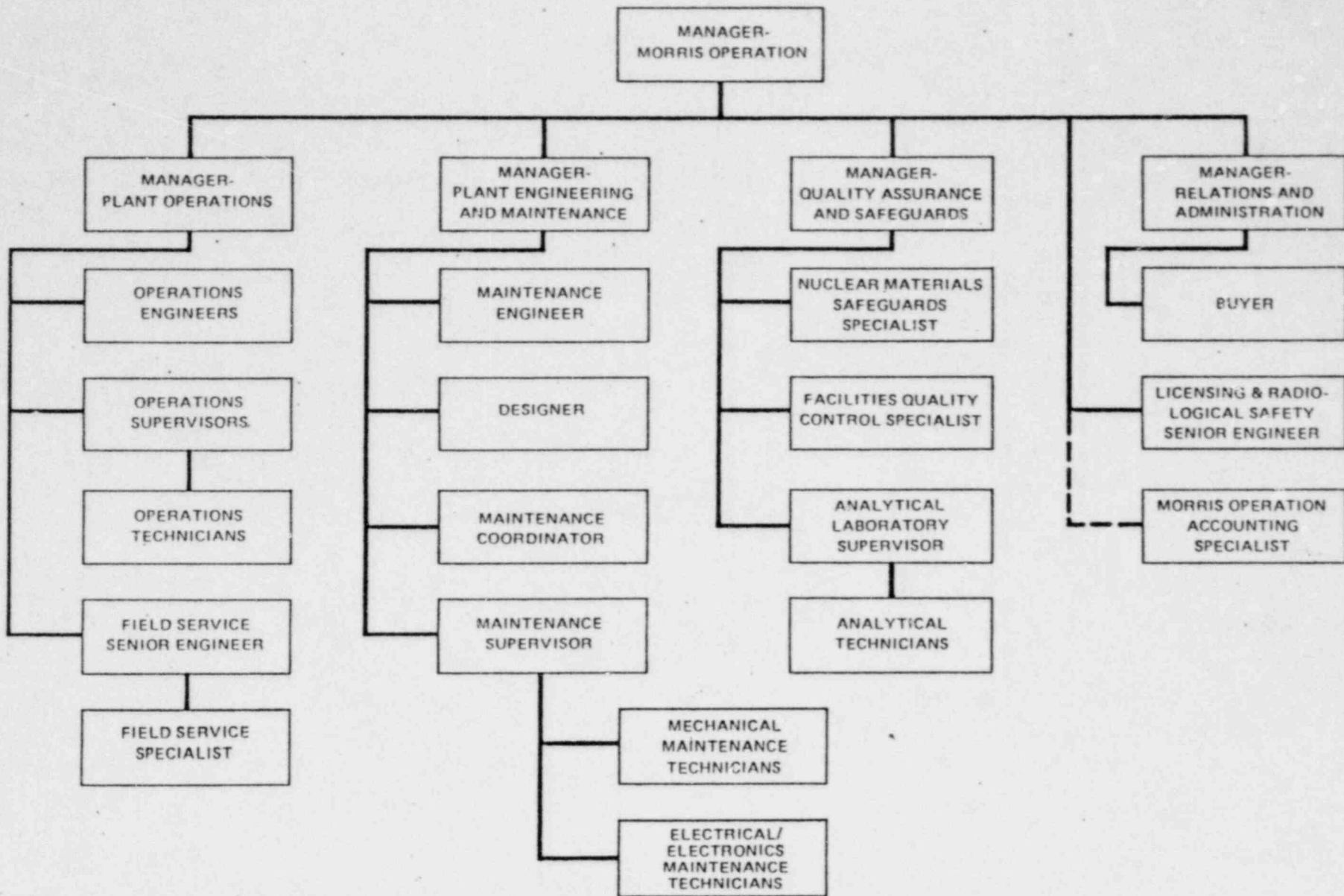
The QA program includes an indoctrination and training program to assure that persons involved in quality-related activities are knowledgeable in QA instructions and requirements. This program also maintains a high level of personnel competence and skill in the performance of quality-related activities.

Quality is verified through surveillance, inspection, testing, checking and audit of safety-related activities. The QA program requires that quality verification be performed by personnel other than those who performed the actual work activity. Inspections are performed using preplanned checklists by QA/QC personnel in accordance with written and approved inspection plans. The qualifications of inspectors, who are independent from the individual or group performing the activity being inspected, and their current status to conduct inspections, tests and examinations are based on applicable codes, standards, and GE training programs. Nondestructive examination personnel are certified in accordance with SNT-TC-1A. Audits are performed in accordance with written procedures or checklists by appropriately trained QA personnel not having direct responsibility in the areas being audited. The audit activities, which are conducted on a periodic basis, include an objective evaluation of QA practices, procedures and instruction; work areas, activities, processes and items; the effectiveness of implementation of the QA program; and compliance with policy directives. The QA program requires both documentation of audit results and formal notification of the audit findings to management of the audited function. Management for the area audited implements

the corrective action within the time constraints committed in their response to questions submitted to them on February 28, 1980 by the staff. Significant audit findings are included in periodic reports to management from the Manager of QA.

CONCLUSION

Based on our evaluation of the qualifications, duties, responsibilities, and authority for the various individual positions performing QA functions, we conclude that the QA organization for SFSO has sufficient authority, and independence from undue influences of cost and schedule, to effectively conduct the QA program. Our review and evaluation of the QA program has shown that GE's QA program provides a comprehensive system of planned and systematic controls such that quality-related activities will be conducted in accordance with the requirements of Appendix B to 10 CFR 50. We therefore conclude that GE's QA program is acceptable for the operations at the Morris nuclear fuel storage facility.



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 January 1979

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Figure 1. Morris Operation Organization

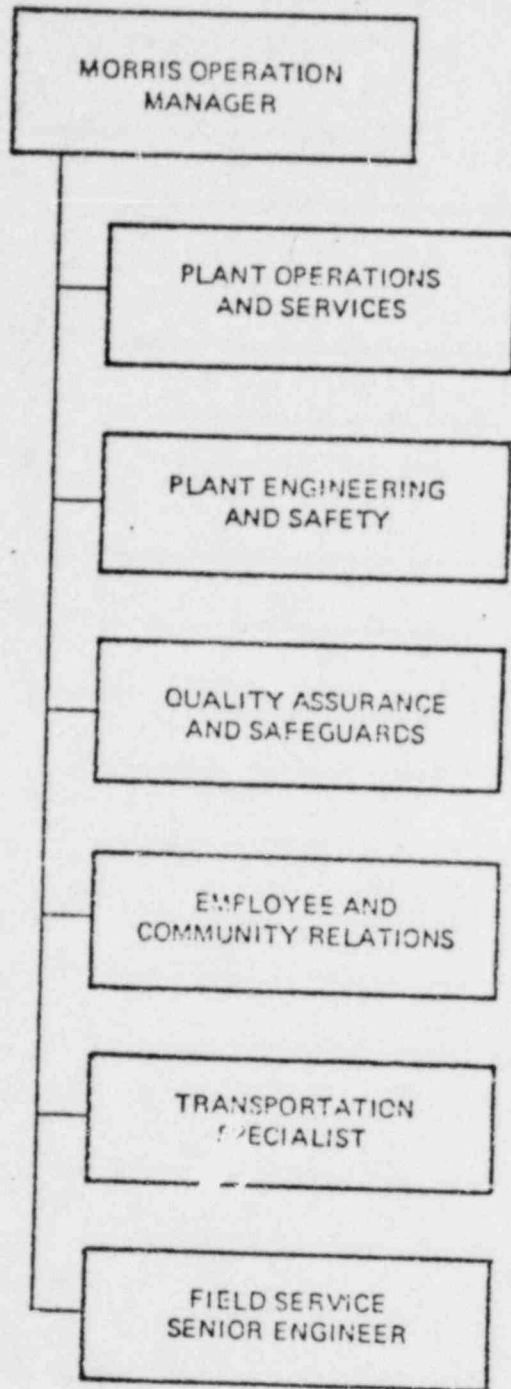


Figure 2 Morris Operation Organization

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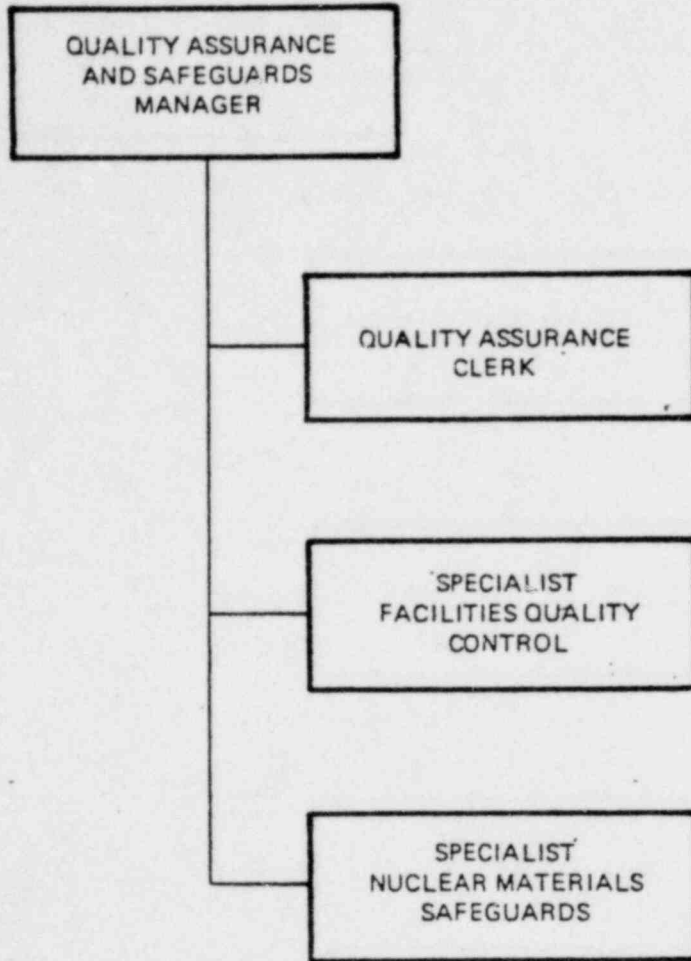


Figure 3. Quality Assurance and Safeguards Organization (Morris Operation)