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July 27, 1990

Mr. R. Howard Smith, Director
Corporate Quality Assurance
Pacific Nuclear Systems, Inc.
1010 South 336th Street
Federal Way, WA 98003

Dear Mr. Smith:

We have completed our initial review of the PNSI QA Manual which was submitted to us on May 21, 1990. After comparing it to the previously-accepted NUTECH QA Manual (see the NRC letter from S. H. Weiss to you dated August 5, 1988), we find that we require additional information.

Please respond to the enclosed request for additional information such that we can complete our review. If you have any questions concerning the enclosed request, please call the staff reviewer, Jack Spraul, on (301) 492-1023.

Sincerely,

Original signed by:

Anthony T. Gody, Chief
Performance and Quality Evaluation Branch
Division of Licensee Performance
and Quality Evaluation
Office of Nuclear Reactor Regulation

Enclosure:
As stated

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Document Name: PNSI RAI EDITION NO.2

*See previous concurrence

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

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Office of Nuclear Reactor Regulation

Enclosure:
As stated

ENCLOSURE

PACIFIC NUCLEAR SYSTEMS, INC. (PNSI)
REQUEST FOR ADDITIONAL INFORMATION (RAI)
QUALITY ASSURANCE (QA) MANUAL
EDITION NO. 2

1. Discuss why the new or revised definitions of the following terms do not agree with the definitions in NQA-1.

   Audit
   Certification
   Inspection
   Nonconformance
   Procurement Document
   Receiving
   Repair
   Rework
   Surveillance (Source)

2. Section 2.0 uses the term "safety-related." Elsewhere in the manual this has been changed to "quality-related." Is this intentional or an oversight?

3. The second paragraph of Section 2.1.4 (which used to have the QA Administrator review "all Project Plans, regardless of the indicated applicability of QA requirements....") limits the QA Manager's review of project plans to only those "for quality related projects." Discuss this apparent decrease in involvement of the QA Manager in the review of project plans. (Note that the cover letter of the submittal indicates the actual QA responsibilities of the QA Administrator/Manager remain unchanged.)

4. Section 2.3.2 of the new manual (corresponding to the previous Section 2.2.2) no longer commits that the Director, Corporate QA (corresponding to the Corporate QA Manager) will conduct annual reviews of the QA Manual to ensure consistency with the QA criteria documents identified therein. Clarify whether this omission was an oversight or, if not, justify this apparent reduction in commitment.

5. Section 3.1.8 has added words that allow design verification to be done by individuals from the same project team. Clarify how "independence" is ensured when this is this case.

6. Section 7.1.7.a refers to items or services being performed. Previously it referred to items or services being procured. Clarify.

7. Section 8.2.2 allows the responsibility of the Project Manager for assuring that all documentation required by a purchase document is "received" and is acceptable to be changed to assuring that all such documentation is "developed" and is acceptable. This appears to be a commitment reduction which should be clarified or justified.

8. Section 9.2 no longer requires the Project Manager to review and approve in-house procedures which describe and control special processes. Identify who (by position title) now has this responsibility.

9. Section 10.2.3 appears to allow Level I inspectors to determine the acceptability of inspection results. This is permitted for nondestructive test inspectors in the August 1984 edition of SNT-TC-1A which has been added to Section 2.1.2 of the manual. It is not permitted in the June 1975 edition. Neither is it permitted by ANSI/ASME N45.2.6-1978 (Table 1) as endorsed by Revision 1 of the Regulatory Guide 1.58. Regulatory Guide 1.58 also endorses the June 1975 edition of SNT-TC-1A. In light of the commitment in Section 2.1.2 of the manual to Regulatory Guide 1.58 and ANSI/ASME N45.2.6-1978, either commit to the June 1975 edition of SNT-TC-1A and make Level II inspectors responsible to determine the acceptability of inspection results or justify not doing so. Note that this is in consonance with Rev. 3 of Regulatory Guide 1.28 which, in its endorsement of NQA-1, states that the provisions of Appendix 2A-1 (or acceptable alternatives) should be met as part of Supplement 2S-1.

10. Section 10.2.5 now makes the Project Manager responsible for "compiling" inspection records rather than "maintaining" inspection records. This appears to contradict Section 17.2.1 which indicates the Project Manager is responsible for identifying, indexing, and storing product-related records under his jurisdiction. Clarify.

11. Section 13.0 has deleted "preservation" from the listed activities. Either justify this deletion or replace the activity.

12. Section 15.1.5 has limited the reporting of nonconforming items dispositioned use-as-is or repair to the customer only "if contractually required." Justify or delete this limitation.

13. Section 15.2.1 states that the Project Engineer is responsible for determining and approving the disposition of nonconforming items. Clarify how this correlates with the new Section 2.2 which addresses the use of a Material Review Board.

14. Section 17.2.2 no longer states that the QA Managers are responsible "for maintenance of training records for testers, inspectors and auditors." Justify or replace this deletion.