January 14, 1994

Response to: Docket No. 99900504

Mr. Leif J. Norrholm
Chief, Vendor Inspection Branch
Division of Reactor Inspection and Licensee Performance
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Norrholm:

As per your letter dated December 16, 1993, (Docket No. 99900504), Gilbert / Commonwealth (G/C) is providing a summary of our evaluations of the noted error notifications received from Boeing Computer Services (BCS).

As part of our Design Control Program, computer programs are verified by G/C and have a Computer Program Custodian assigned. The Custodian is responsible for the technical use and support of the program. The Custodian has reviewed each of the error messages described in your letter for each of the three computer programs (GTSTRUDL, ANSYS, and NUPIPE-II) to determine their significance to safety.

Verification of computer programs for use at G/C establishes the technical adequacy of the program <u>within our limits of use</u>. In addition, <u>each use</u> of a computer program is reviewed and independently verified (inputs are evaluated and outputs are reasonable when compared to the inputs) when used for safety-related calculations. This is in addition to the independent verification of the computer program.

The Custodians considered the following for each error message:

- whether it pertains to a particular revision of the computer program used - In many cases, the computer program revision used by G/C is not listed as having that error

- whether it applies to our area of usage of the computer program - Computer programs at G/C are verified for more specific uses and limits on the broad potential capability of the entire program. In the majority of cases, it was found that the error applies to an area of the computer program that has not been used by G/C.

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The results of these reviews are as follows:

- 49 of the errors were found to be against a revision of the program not used by G/C

- 91 of the errors were found to be in an area or function of the program never used by G/C (e.g. G/C did not and does not use GTMODELER)

- 26 of the errors were found to be editorial in nature or having no impact on analytical results (e.g. job would abort)

- the few remaining errors were found to have no significant impact which would adversely affect safety based on the requirements of the G/C Design Control Program requiring independent design verification of each use of the computer program.

If there are any questions, please contact me at (610) 775-2600 extension 3367.

Carl Vath
Manager, Engineering Services