October 21, 1982

Mr. Vincent S. Noonan
Division Manager
EDS Nuclear Inc.
445 Broad Hollow Road
Melville, New York 11747

Dear Mr. Noonan:

Subject: Technical Design Verification of the Near Term Operating License Plants

Thank you for forwarding to Mr. H. Denton a copy of your recent EDS Nuclear Inc. paper on the "Near Term Operating License Plant's Technical Design Verification Program." Mr. Denton has asked me to respond to your letter. The subject of your report is one of great interest to the NRC.

As you are aware, the NRC staff is undertaking several initiatives to assess and to improve the quality of design and construction of nuclear power plants prior to licensing. Among the initiatives which have been implemented, is a Quality Assurance (QA) Review Program which calls for certain near-term operating (NTOL) applicants to assess programs to assure proper design control, design verification, and subsequent plant construction. As part of the verification process, several applicants have embarked on internal and/or third party reviews of various aspects of design, construction, and quality assurance. In determining the acceptability of the NTOL applicant's specific quality assurance or independent design reviews, the staff has considered such factors as previous quality assurance performance, degree of utility involvement in the QA programs, specific construction problems, as well as utility and QA staff size and capabilities. The scope and extent of additional measures that are necessary has varied from applicant to applicant, based on these and other related factors.

The three-phase program which you outline in your Technical Design Verification Program report contains concepts which are consistent with Independent Design Verification Programs underway at several nuclear facilities to provide additional documentation and assurance of quality plant design and construction. However, as I noted above, the various plant and utility specific elements weigh heavily in the staff review, and as such, any generic comments addressing Design Verification Programs taken out of the plant-specific context is difficult. I would also point out, however, that programs are under development to provide more standardized procedures for the utility-applicant and NRC staff to gain the appropriate level of assurance that a plant has been designed and built to operate in accordance with its Safety Analysis Report.

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Your interest in achieving nuclear power plant quality assurance goals is greatly appreciated.

Sincerely,

Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

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EDS Nuclear Inc.
445 Broad Hollow Road
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Your interest in achieving nuclear power plant quality assurance goals is greatly appreciated.

Sincerely,

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Harold R. Denton, Director
Office of Nuclear Reactor Regulation

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