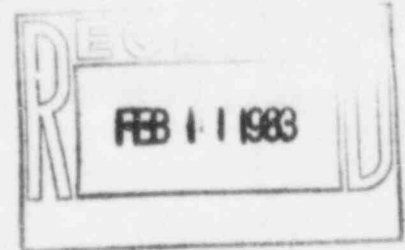


SOUTHWEST RESEARCH INSTITUTE

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Department of Engineering Mechanics
February 9, 1983

Mr. Uldis Potapovs
Chief Vendor Program Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



Reference: Our meeting at Southwest Research Institute 1/18/83
Docket No. 99900909

Dear Sir:

I would like to express the appreciation of Southwest Research Institute for the visit of you and members of Region IV to our facilities on 1/18/83 to discuss a number of topics pertinent to your inspection program for laboratories performing Class 1E equipment qualification. This exchange of views and information was exceedingly useful to us and we hope to you as well. I am attaching a list of attendees for your records. Attached is also a brief minutes of the meeting which I hope includes most of the important points we covered. We would like to follow up on certain of these points which are of particular interest to us. These are the following:

1. It was stated that Region IV could do what the IEEE accreditation program was going to do in terms of reviewing a test lab for adequacy of QA methodology with subsequent written confirmation, so that individual vendor audits would not have to be performed solely to determine if the test lab's QA methodology was adequate. This would be something similar to what is described in Paragraph 5, page III of the Preface of NUREG 0040. We would be anxious to submit our Quality Assurance Program for review and acceptance as described in this paragraph expecting that following a satisfactory review we would obtain a confirming letter as described in paragraph 7 of the Preface. Please advise us as to what steps we should take to initialize this type of QA methodology review.
2. We were advised that there is currently a system for annual "SALP" grading which is not currently applied to qualification labs. This grading system would be a method of advising the public as to the overall adequacy of individual test labs in performing qualification work after they had undergone a suitable review by NRC personnel. We view this as a way of obtaining the positive effects of what would have been expected from

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SAN ANTONIO, TEXAS
WITH OFFICES IN HOUSTON, TEXAS, AND WASHINGTON, D. C.

Mr. Uldis Potapovs
U.S. NRC, Region IV

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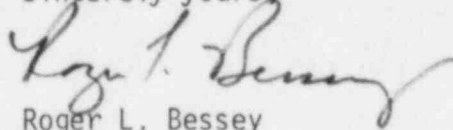
February 9, 1983

the proposed IEEE accreditation program, namely, a statement from an inspecting agency that indicates a test lab is doing an overall good job, where in fact that is the case. Would you please advise us as to how we can initialize a review of our laboratories which would lead to this type of grading.

3. We are sending under separate cover a letter discussing our view of your report 99900909/82-03.

We sincerely believe the type of interface which we were able to have at this meeting is very valuable in working out problems which may arise with this relatively new inspections program as well as generating ideas with regard to how the inspection process can be improved for the benefit of the industry as a whole and the American public. We look forward to continued open frank and sincere communication between your office and SwRI, and we hope that we can both be a positive force in maintaining a safe nuclear industry and in informing the public as to the measures taken to keep that industry safe.

Sincerely yours,



Roger L. Bessey
Group Leader

RLB:dr
Attach.

Company: SOUTHWEST RESEARCH INSTITUTE

Dates 1/18/83

Docket/Report No. 99900909

Inspector AL SMITH

Page 1 of 1

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Minutes of the Meeting with NRC Region IV Officials
of 1/18/83

1. Attendance - Attached is a copy of the attendance list.
2. Mr. Uldis Potapovs gave a presentation discussing a number of pertinent items. Individuals among those attending responded with questions and comments leading to the major points listed below.
 - 2.1 The testing verification program has not begun yet but will probably be the responsibility of one of the National labs. Right now it has a low priority.
 - 2.2 Region IV will be covering many of the areas that the IEEE accreditation program was going to cover, integrating QA and technical adequacy.
 - 2.3 It is possible that if a test lab submits to a voluntary QA audit according to paragraphs in the Preface of NUREG 0400, they could obtain written confirmation of satisfactory implementation of their QA program which could be used to relieve the test laboratory of vendor audits aimed solely at checking out QA methodology. This is something SwRI would need to follow up on.
 - 2.4 The vendor equipment qualification program for the whole country is handled out of the Region IV office. About 30 major labs have been audited and more will be audited.
 - 2.5 There is an annual "SALP" grading which is not currently applied to qualification labs. This is potentially a method by which the NRC could provide written confirmation that a qualification lab was doing an overall good job, the type of positive statement that would have been the outcome of the IEEE accreditation program. Mr. John Collins, Regional Administrator, Region IV, said he would look into this, but expressed concern that NRC personnel was limited to cover already existing programs let alone any new programs.
 - 2.6 Ten CFR 2.01, a new revision of 10 CFR 2 applies the civil penalties to qualification labs. Currently we are falling under the "miscellaneous matters" section of 10 CFR Part 2.
 - 2.7 SwRI should respond with a letter stating our disagreement with regard to the wording "test failures" in the recent inspection report. If NRC agrees with our technical point, they will so note in the report which will go in the White Book. In general, in the future where we feel there are technical errors in the NRC inspections reports we can disagree and NRC will acknowledge if our point is well taken and the statement of disagreement will go as a unit with the report. The procedure to be followed is the same as for Proprietary Data Action, i.e., there are 25 calendar days to respond.

Minutes of Meeting of 1/18/83 - continued

2.8 At exit interviews important conclusions of the inspection will be discussed. If there are changes in these conclusions subsequent to the exit interview the NRC will notify us.

2.9 NRC "does not make technical judgments".

2.10 NRC consulting personnel do not make independent judgments during inspections. The NRC inspector makes decisions and is only advised by the consultant. We should talk to the inspector if we have a problem with the consultants.

2.11 We discussed the signing of a liability statement by NRC consultants generated by SwRI to preclude use of confidential information consultants may be privy to during inspections. SwRI counsel should pursue this matter with the NRC counsel.
