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

MAR 15 1985

Docket No. 50-602

MEMORANDUM FOR: Cecil O. Thomas, Chief
Standardization & Special Projects Branch
Division of Licensing
Office of Nuclear Reactor Regulation

FROM: Brian K. Grimes, Director
Division of Quality Assurance, Vendor, and
Technical Training Center Programs
Office of Inspection and Enforcement

SUBJECT: QA FOR UNIVERSITY OF TEXAS TRIGA REACTOR

Your memorandum dated December 19, 1984 requested our review of the QA portion of the University of Texas SAR submitted with its TRIGA reactor CP/OL application. This memo is in response to your request.

The QA Branch has reviewed the QA program description provided in Chapter 9 of the November 9, 1984 SAR against the applicant's commitment to Regulatory Guide 2.5, "Quality Assurance Program Requirements for Research Reactors," reissued October 1977. This regulatory guide describes a method acceptable to the NRC staff of complying with paragraphs (a)(7) and (b)(g)(ii) of 10 CFR 50.34 with regard to overall QA program requirements for research reactors. It states that ANSI N402-1976, "Quality Assurance Program Requirements for Research Reactors," provides an acceptable method for complying with the noted regulations.

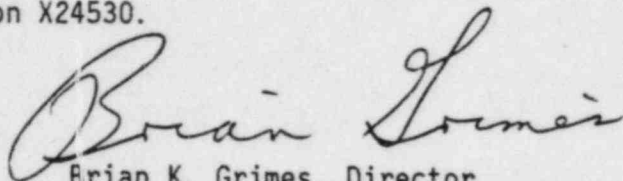
The results of the review are reflected in the enclosed request for additional information. Acceptable resolution of the 9 items given in the enclosure will result in a finding of acceptability of the QA program description. Note that the acceptability of the list in response to item 1 will have to be determined by NRR technical review personnel knowledgeable of the TRIGA reactor. The extent and nature of this list should take into account the degree of hazard posed by failure of plant structures, systems, and components for this type of reactor.

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A PDR

Cecil O. Thomas

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Any questions on the above or on the enclosure should be addressed to the QA Branch reviewer, Jack Spraul, on X24530.



Brian K. Grimes, Director
Division of Quality Assurance, Vendor, and
Technical Training Center Programs
Office of Inspection and Enforcement

Enclosure:
Request for Additional QA Information

cc w/enclosure:
T. Novak, NRR
A. Chu, NRR

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UNIVERSITY OF TEXAS TRIGA REACTOR
REQUEST FOR ADDITIONAL QA INFORMATION

1. Section 2.1 of ANSI standard N402 requires that the applicant identify the systems and components to be covered by the QA program, and the introduction of the standard indicates these shall include at least the reactor safety and protection system, engineered safety features, and the radiation monitoring system. In response to the above, section 9.1 of the SAR states:

Safety-related identifications for quality assurance are determined from license specifications. The specifications for safe operation include design features, safety limits and limiting conditions for operation. The application of quality assurance shall be considered for those structures, systems or components in the technical specifications that are either design features or required as limiting conditions for operation. Such systems should include the control and safety system, radiation monitoring system and other support systems.

Provide a clearer definition (i.e., a list) of the safety-related structures, systems, and components controlled under the University of Texas QA Program described in chapter 9 of the SAR.

2. The QA program described in the SAR should consist of commitments that will assure the health and safety of the public. Therefore, "should" at the following locations should be changed to "shall:"
 - a. Section 9.2.1, first paragraph, line 7
 - b. Section 9.2.1, third paragraph, line 4
 - c. Section 9.3.1, third paragraph, line 1

Similarly, the "or" in the last sentence of SAR section 9.2.4 and 9.2.5 should be changed to "and". Make these changes or justify not doing so.

3. SAR section 9.1.3 states that execution of specific elements of the QA program may be delegated. Describe measures which assure that ultimate responsibility for such delegated actions remain with the facility Supervisor.
4. The first paragraph of SAR section 9.2.2 indicates that procurement document approval may be by a person "knowledgable of the procurers qualifications." Such approval does not appear to independently verify the adequacy of the technical and QA requirements of the procurement. Revise the last sentence of this paragraph to assure such verification.

5. Describe measures which assure the in-service inspection of completed safety-related structures, systems and components.
6. The last sentence of SAR section 9.3.4 limits the documentation and disposition of nonconformances to "significant." Define or eliminate this limitation.
7. Describe measures which assure that the QA program will be applied during the design, fabrication, and installation of safety-related experimental equipment.
8. Describe measures which assure that replacement, modification, or changes of safety-related items shall be documented as meeting or exceeding the original requirements.
9. The last sentence of SAR section 9.1 (page 9-2) and reference 1 in section 9 (page 9-11) appear to have a typographical error in that the applicable regulatory guide is 2.5, not 5.2. Clarify.