



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 6, 1996

Mr. Nicholas J. Liparulo, Manager
Nuclear Safety and Regulatory Activities
Nuclear and Advanced Technology Division
Westinghouse Electric Corporation
P.O. Box 355
Pittsburgh, Pennsylvania 15230

SUBJECT: COMMENTS ON QUALITY ASSURANCE (QA) FOR SYSTEMS, STRUCTURES, AND COMPONENTS (SSCs) SUBJECT TO THE REGULATORY TREATMENT OF NON-SAFETY SYSTEMS (RTNSS)

Dear Mr. Liparulo:

On April 18, 1996, members of the Nuclear Regulatory Commission (NRC) staff held a teleconference with Westinghouse representatives to discuss Westinghouse letter NSD-NRC-96-4670, "Quality Assurance Requirements for AP600 RTNSS Systems, Structures, and Components," dated March 26, 1996. Westinghouse stated in the letter that it was preparing a "QA program requirements document", based on standards included in the enclosure to the Westinghouse letter for use in RTNSS SSC procurements.

The staff inquired as to the specific purpose of such "QA program requirements document" in the context of information required by the staff for design certification of the AP600. Westinghouse stated that it does not intend to include the QA criteria for RTNSS-identified SSCs in Chapter 17 of the AP600 Standard Safety Analysis Report (SSAR) and that the applicability of such criteria would be limited to procurement, and procurement-related activities, of RTNSS-identified SSCs during the initial design and construction phase of the AP600 plant. Post-design activities (e.g., modifications, operations, etc.) on RTNSS-identified SSCs would be the responsibility of the COL applicant.

In the draft safety evaluation report (DSER), the staff stated that it considers that the QA criteria applied to RTNSS should be comparable to that described in Generic Letter 85-06 for Anticipated Transient Without Scram, and Regulatory Position 3.5 and Appendix A of Regulatory Guide 1.155, for station blackout non-safety-related equipment (Open Item 17.1.3-1).

While the staff agrees, in principle, that the QA criteria delineated in Westinghouse letter would satisfy the staff requirements for RTNSS-identified SSCs during the initial design and construction phase, such QA criteria must still be either included or referenced (via a specific docketed document) in Chapter 17 of the SSAR for the staff to reach its safety determination on the AP600 design certification. A COL applicant would then be required to implement a QA program meeting such QA criteria for all activities affecting RTNSS-identified SSCs not under Westinghouse's responsibility.

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Mr. Nicholas J. Liparulo

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Therefore, the staff requests that Westinghouse provide a specific response for closure of DSER Open Item 17.1.3-1 by including or referencing in Chapter 17 of the AP600 SSAR the QA criteria it intends to apply to RTNSS-identified SSCs during the initial design and construction phase of the AP600 plant.

If you have any questions regarding this matter, you can contact me at (301) 415-1141.

Sincerely,

original signed by:

William C. Huffman, Project Manager
Standardization Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 52-003

cc: See next page

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Westinghouse Electric Corporation

Docket No. 52-003
AP600

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