



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 29, 1997

52-003

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

SUBJECT: RESPONSE TO WESTINGHOUSE LETTER DATED JUNE 9, 1997, REGARDING
INSPECTION NO. 99900404/97-01

Dear Mr. Liparulo:

The Nuclear Regulatory Commission (NRC) staff has reviewed the June 9, 1997, Westinghouse letter responding to NRC Inspection Report No. 99900404/97-01, dated May 2, 1997. Two nonconformances and one unresolved item were identified in the inspection report. Based on the response, the staff continues to have outstanding concerns about the past application of the Westinghouse quality assurance (QA) program to activities resulting in design deliverables used to support design certification of the AP600. The staff has determined that clarification or additional information is necessary to assess some of the Westinghouse statements in the June 9, 1997, letter. The resolution of the staff's concerns regarding the past implementation of the QA program is critical to assess the validity of the staff's safety conclusions and/or findings that have been based upon past reviews of such design deliverables.

In the cover letter, Westinghouse states that in response to the 1994 staff design review, Westinghouse identified the basemat design error as a condition adverse to quality and implemented the corrective actions. The staff did not find evidence of such an action during the inspection, as identified in the inspection report, or in the response letter. Westinghouse's response states that the basemat error was controlled as a design change and resulted in the revision to the [emphasis added] calculation. Further, the response letter states that the revision was performed in accordance with the INITEC QA procedure. The staff requests that Westinghouse identify the quality assurance procedure(s) used to identify, analyze, document, and correct the basemat calculation error as a condition adverse to quality in a manner that demonstrates adherence and conformance to the Westinghouse AP600 QA program.

Westinghouse also states in the response that "at the time of the [1995] audit, Westinghouse QA had not received INITEC letter INI/FOK0175 documenting INITEC's response to Westinghouse's August 3, 1994, letter nor did it surface during the audit." Additionally, the response letter states that in the August 3, 1994, letter to INITEC, "Westinghouse identified the error to INITEC for corrective action under their quality assurance program." It is unclear why the letter to INITEC or related INITEC QA activities were not reviewed would not surface during the QA audit if the AP600 QA program was being appropriately and consistently implemented as stated in the response letter.

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The staff requests that Westinghouse clarify these statements to demonstrate appropriate Westinghouse QA oversight of design activities at INITEC. Further, please explain how Westinghouse QA determined that the review of the basemat calculation was sufficient, in and of itself, to conclude that no other deficiencies in INITEC's design control measures existed (e.g., why the INITEC quality assurance program corrective actions, as requested by Westinghouse in its August 1994, letter were not necessary to be included in the audit scope).

In its June 9, 1997, response, Westinghouse states that "as the AP600 design progresses and matures [emphasis added], design documents are placed under configuration control as described in AP600 program operating procedure, AP-3.2, 'Design Configuration Change Control for the AP600 Program'" and that the 1995 audit concluded that "the calculation was at an 'alpha' revision level and therefore not yet under configuration management control [emphasis added]." Given these statements, it appears that the NRC staff may have reviewed design documents that were "progressing and maturing" or preliminary for purposes of design certification. Therefore, the staff requests Westinghouse describe how this process satisfies the requirements of WCAP-12600, "AP600 Quality Assurance Program Plan," for design deliverables that are submitted, pursuant to 10 CFR Part 52, for NRC's review and approval as part of design certification of the AP600.

The response letter describes recent Westinghouse activities and references information that the staff has not been able to review. In addition to the need for clarifications described herein, the staff requests that Westinghouse provide copies of the documents and information listed below.

1. The November 1994 Westinghouse letter that was sent to active suppliers in response to the INITEC error.
2. The June 6, 1997, INITEC supplemental response (INI/FOK0608).
3. The report or additional information on the Westinghouse May 1997, audit of INITEC, in which the conclusion was reached that the error was an isolated incident. The information should include a description of the depth and breadth of review performed by Westinghouse, organizations involved, sample size, assumptions made, and number of individuals involved.
4. The report or documentation regarding the independent audit of the Westinghouse Quality Program that was completed on May 30, 1997. The information should include the breadth and scope of the audit, the conclusions, and the Westinghouse disposition of the three findings and four recommendations identified during the audit.
5. The list of all AP600 technical cooperation agreement participants. Westinghouse provided a list of all international design participants, but did not provide information regarding any domestic technical cooperation agreement or design participants, if any. The staff requests that Westinghouse clarify this information.

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- 6. Information on the breadth and scope of the detailed management review held on June 3, 1997.
- 7. The review plan for the Westinghouse design assurance review. The response should include a description of the depth and breadth of review Westinghouse intends to perform or performed, organizations involved, sample size, assumptions made, and number of individuals involved.

The staff would like to discuss these recent activities with Westinghouse management. Please be prepared to discuss the design assurance review plan and other responses to this letter. A timely response to these issues is expected since it may affect the staff's conclusions in the AP600 safety evaluation report. You may contact Diane Jackson at (301) 415-8548 to schedule this meeting.

Sincerely,

Original signed by
Seymour H. Weiss FOR

Marylee M. Slosson, Acting Director
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 52-003

cc: See next page

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Docket No. 52-003
AP600

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