November 3, 2000

MEMORANDUM TO: Eric J. Leeds, Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

THRU: Melanie A. Galloway, Chief /RA/
Enrichment Section
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

FROM: Andrew Persinko, Project Manager /RA/
Enrichment Section
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

SUBJECT: SUMMARY OF IN-OFFICE REVIEW OF DUKE COGEMA STONE & WEBSTER QUALITY ASSURANCE DOCUMENTS FOR THE MIXED OXIDE FUEL FABRICATION FACILITY

Executive Summary

The Nuclear Regulatory Commission (NRC) is currently reviewing the Mixed Oxide (MOX) Project Quality Assurance Plan (MPQAP) submitted by letter dated June 22, 2000. To support its review, on October 17-20, 2000, NRC staff from the Division of Fuel Cycle Safety and Safeguards (FCSS) conducted an in-office review of quality assurance (QA) documents and information associated with the mixed oxide (MOX) fuel fabrication facility being designed by Duke Cogema Stone & Webster (DCS). The review was conducted at COGEMA/SGN's offices in Bagnols-sur-Ceze, France. SGN is a wholly owned subsidiary of COGEMA and is doing much of the DCS design work on the MOX fuel fabrication facility. A similar review was conducted at the DCS offices in Charlotte, North Carolina, on August 16-18, 2000. Information reviewed during the in-office review included the project design, engineering, and QA organization and functional responsibilities, relationship of the COGEMA/SGN organization in Bagnols-sur-Ceze, France, to the DCS organization in Charlotte, North Carolina, design control, records management and document control, internal DCS/SGN audit activities, and QA training. The applicant, DCS, and its team member/subcontractor, COGEMA/SGN, responded to questions posed by NRC staff during the visit about the DCS QA plan and its implementation for the MOX fuel fabrication facility project activities.

Review Details

During October 17-20, 2000, Andrew Persinko (MOX Project Manager) and Wilkins Smith (MOX QA reviewer) conducted an in-office review of QA documents and information associated

with the MOX fuel fabrication facility project. The MPQAP applies to all DCS MOX project activities, including the MOX fuel fabrication process design being performed by COGEMA/SGN. The MPQAP has been submitted to the NRC for review, in advance of the application for construction authorization. The staff reviewed the QA organization and functional responsibilities, relationship of the COGEMA/SGN organization in Bagnols-sur-Ceze, France, to the DCS organization in Charlotte, North Carolina, design control, records management and document control, internal DCS/SGN audit activities, and QA training. DCS/COGEMA/SGN provided QA procedures, examples of design control processes and products, training records and responded to questions from NRC staff about the DCS QA plan and its implementation for the MOX fuel fabrication facility.

In general, the documents appeared to be in order with proper sign-offs and approvals, the documents appeared to be technically clear and understandable, and the NRC staff had full cooperation of DCS and COGEMA/SGN personnel and obtained prompt answers to questions. There were no indications of any wide-ranging QA programmatic deficiencies. The NRC staff noted, however, that SGN had not fully implemented or documented DCS MPQAP requirements for document control and QA training. The NRC staff also noted that some of the controlling QA procedures could be improved to more completely address: (1) design control with respect to when confirmation of data in a calculation or procedure is necessary and with respect to date convention, (2) records management with respect to removing controlled documents from the central records center and management of information that is received via e-mail from other DCS offices, (3) sources of design input to be more specific with respect to reliance on Melox or LaHague experience, and (4) QA training and documentation of training. As a result of the NRC staff review, the DCS QA manager stated his intent to review these procedures for possible improvement and to issue an internal DCS QA corrective action request to more thoroughly review the training records and assure that they meet the QA plan.

NRC staff noted that it intends to conduct inspections of DCS QA implementation after the DCS application for construction authorization is submitted. Slides used by COGEMA/SGN in its introductory remarks are attached.

Exit Meeting Attendees on 10/20/2000

Andrew Persinko	NRC
Wilkins Smith	NRC
J. Bach	COGEMA/SGN
M. Broussard	COGEMA/SGN
M. De Donder	COGEMA/SGN
J. Belmont	COGEMA/SGN
J. Weiss	COGEMA/SGN
J. Crustin	COGEMA/SGN
R. Brackett	DCS

Docket: 70-3098

Attachment: COGEMA/SGN Meeting Slides

cc:
P. Hastings, DCS
J. Johnson, DOE
H. Potter, SC Dept. of HEC
J. Conway, DNFSB

with the MOX fuel fabrication facility project. The MPQAP applies to all DCS MOX project activities, including the MOX fuel fabrication process design being performed by COGEMA/SGN. The MPQAP has been submitted to the NRC for review, in advance of the application for construction authorization. The staff reviewed the QA organization and functional responsibilities, relationship of the COGEMA/SGN organization in Bagnols, France, to the DCS organization in Charlotte, North Carolina, design control, records management and document control, internal DCS/SGN audit activities, and QA training. DCS/COGEMA/SGN provided QA procedures, examples of design control processes and products, training records and responded to questions from NRC staff about the DCS QA plan and its implementation for the MOX fuel fabrication facility.

In general, the documents appeared to be in order with proper sign-offs and approvals, the documents appeared to be technically clear and understandable, and the NRC staff had full cooperation of COGEMA/SGN personnel and obtained prompt answers to questions it posed to SGN. There were no indications of any wide-ranging QA programmatic deficiencies. The NRC staff noted, however, that some of the controlling QA procedures could be improved to more completely address: (1) design control with respect to when confirmation of data in a calculation or procedure is necessary and date convention, (2) records management with respect to removing controlled documents from the central records center and management of information that is received via email from other DCS offices, (3) sources of design input to be more specific with respect to reliance on Melox or LaHague experience, and (4) QA training and documentation of training. As a result of the NRC staff review, the DCS QA manager stated his intent to review these procedures for possible improvement and to issue an internal DCS QA corrective action request to more thoroughly review the training records and assure that they meet the QA plan.

NRC staff noted that it intends to conduct a more thorough audit of DCS QA implementation at a future time. Slides used by COGEMA/SGN in its introductory remarks are attached.

Exit Meeting Attendees on 10/20/2000

Andrew Persinko	NRC
Wilkens Smith	NRC
J. Bach	COGEMA/SGN
M. Broussard	COGEMA/SGN
M. De Donder	COGEMA/SGN
J. Belmont	COGEMA/SGN
J. Weiss	COGEMA/SGN
J. Crustin	COGEMA/SGN
R. Brackett	DCS

Docket: 70-3098

Attachment: COGEMA/SGN Meeting Slides

cc:
P. Hastings, DCS
J. Johnson, DOE
H. Potter, SC Dept. of HEC
J. Conway, DNFSB

DISTRIBUTION: Docket: 70-3098 ADAMS PUBLIC SPB r/f FBurrows
WSmith SSteele RWescott RPierson MWeber
G:\SPB\AXP1\MOXQAREVIEWSGN.WPD

OFC	SPB		SPB		SPB		SPB			
NAME	APersinko:cc		WSmith		DHoadley		MGalloway			
DATE	11/3/00		11/3/00		11/3/00		11/3/00			

OFFICIAL RECORD COPY