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SUBJECT: Responds to NRC 891011 ltr re violations noted in Insp Rept  
 50-397/89-28.

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November 13, 1989  
Docket No. 50-397  
G02-89-206

U.S. Nuclear Regulatory Commission  
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Subject: RESPONSE TO INSPECTION REPORT ISSUES - COMMERCIAL GRADE  
PROCUREMENT PROGRAM

Reference: Letter, R. P. Zimmerman to G. C. Sorensen, NRC Inspection at  
WNP-2 (Report No. 50-397/89-28), dated October 11, 1989.

This letter is provided in response to the referenced inspection report (No. 50-397/89-28). The inspection report concludes that "the licensee's procurement program is weak with respect to the dedication of commercial grade items for safety-related use . . ." It also indicates a perceived reluctance on the part of the Supply System to aggressively pursue areas of NRC concern with this issue and it states that we must take further actions to test the adequacy of past procurement practices.

As you are aware, we will be attending a meeting with the staff on November 20, 1989, regarding the staff's procurement findings. However, we believe that several issues raised by the inspection report should be clarified prior to that meeting as follows:

- 1) The Supply System's current commercial grade procurement practices are being upgraded to meet NCIG-07 standards. Upgrading our program to meet these most recent industry standards will be accomplished ahead of the January 1, 1990, target established by NUMARC. As committed in the June 28, 1989, meeting with the NRC, the Supply System will require that before any new procurement or reprourement, the commercial grade dedication package will be reviewed and upgraded, if necessary, to meet the industry accepted NCIG-07 document. Additionally, we have initiated an independent QA/safety assessment to provide increased assurance that we will be in full compliance with NCIG-07 by January. It was our understanding, based on statements made by the inspectors during their inspection, that they agree that our recently implemented practices will result in future procurements that will comply with the revised standards as presently provided in NCIG-07. This understanding is not, however, reflected in the inspection report.

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November 13, 1989

RESPONSE TO INSPECTION REPORT ISSUES - COMMERCIAL GRADE PROCUREMENT PROGRAM

- 2) The Supply System has aggressively pursued improvements in the commercial grade procurement area and more importantly we are committed to continue a proactive approach to ensure a high level of quality of parts that are installed in safety related systems. Adequacy of procured parts is an industry-wide concern (reference IEN 89-70). This concern can be reduced by better inspections, tests, and audits. Industry standards and NRC interpretation of requirements have changed significantly in recent years. The Supply System has participated in developing the improved industry standards (i.e., through both QA and engineering staff representation on industry committees) and has been at the forefront of implementing program improvements at WNP-2. For example, we have responded vigorously to fraudulent component reports (including procurement and use of special materials testing capabilities) and we have implemented significant improvements in our procurement QA, receipt inspection, and procurement engineering functions.
- 3) Regarding the review of past commercial grade procurements, we have undertaken a program to reverify a sample of our past procurements to ensure that they have achieved their intended safety objective. A summary action plan is outlined as an attachment. The basic approach is 1) to implement a "simplified review" process for selected stored parts, and 2) to select a sample of "old" dedication packages to test the adequacy of our past commercial grade procurement processes using an independent consultant.

In summary, we are committed to and are already implementing NCIG-07 standards for all future procurements. We are also instituting a program to examine past procurement practices that will provide us reasonable assurance of the adequacy of our past practices. We are concerned that the subject inspection does not accurately reflect the status of our procurement programs. In addition, based on our interface with NUMARC, we believe that the inspection report may reflect certain changes in NRC's regulatory positions regarding commercial dedication practices authorized in the past.



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Confirming my recent telephone conversations with Region V staff members, the Supply System appreciates the opportunity to clarify the apparent misunderstanding of our corporate posture on this issue in a November 20, 1989 Management Meeting. The meeting will also serve to brief Region V management on our plans (as summarized in the attachment) to review past dedications and the results of reviews of 50 past dedication packages performed to date by our consultant.



G. D. Bouchey, Director  
Licensing & Assurance (MD 280)

GDB/tlr

Attachment

cc: NS Reynolds - Bishop, Cook, Purcell and Reynolds  
RB Samworth - NRC  
G Knighton - NRC  
RP Zimmerman - Region V  
JB Martin - Region V

## EVALUATION OF COMMERCIAL GRADE PROCUREMENT PROGRAMS

<u>Actions</u>	<u>Estimated Completion</u>
<u>Future Procurements</u>	
1) Upgrade current process to enhance conformance to NCIG-07 guidelines	1/90
2) Independent QA/safety assessment of conformance with NCIG-07	12/89
<u>Past Procurements</u>	
1) Resolution of 10 issues identified by NRC	11/89
2) Develop and implement a "simplified review process" for selected stored items procured under past dedication processes in safety-related applications. Use of or upgrading to NCIG-07 standards as part of the abbreviated review would not be required.	12/89
3) Review and resolution of the sample of 50 past procurements evaluated by the independent consultant (CYGNA).	3/90
4) Engineering review to determine if additional sampling is necessary.	12/89
5) As part of the NUMARC initiative to establish a dedication program to meet the criteria of NCIG-07, we will perform reviews of all reorders of items currently installed in the plant or in storage. Accordingly, the results of past procurements will be reviewed over an extended period. If any review identified a mistake with past procurements; i.e., a hardware problem, we will conduct appropriate generic reviews as necessary.	Ongoing
6) Complete additional sampling if needed (see item 4 above).	6/90
7) Reevaluate results of and need to continue the "simplified review process" (see item 2 above).	6/90

