



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 30, 2020

Ms. Camille Zozula
Manager, Infrastructure &
Facilities Licensing
Westinghouse Electric Company
1000 Westinghouse Drive
Building 1, Suite 165
Cranberry Township PA 16066

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: WESTINGHOUSE
ELECTRIC COMPANY TOPICAL REPORT, "QUALITY MANAGEMENT
SYSTEM (QMS)," REVISION 8.0 (EPID L-2020-TOP-0022)

Dear Ms. Zozula:

By letter dated April 27, 2020 (Agencywide Documents Access and Management System Package Accession No. ML20118C993), Westinghouse Electric Company (Westinghouse) submitted to the U.S. Nuclear Regulatory Commission (NRC) Topical Report, "Quality Management System (QMS)," Revision 8.0. Upon review of the topical report, the NRC staff has determined that additional information is needed to complete the review. Enclosed are the NRC staff's requests for additional information. On April 29, 2020, Matthew Shakun of Westinghouse and the NRC staff agreed that the responses to these requests for additional information will be received by May 1, 2020.

If you have any questions, please contact me at 301-415-3151 or by e-mail to Ekaterina.Lenning@nrc.gov.

Sincerely,

/RA/

Ekaterina Lenning, Project Manager
Licensing Processes Branch
Division of Licensing Projects
Office of Nuclear Reactor Regulation

Enclosure:
Requests for Additional Information

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: WESTINGHOUSE
ELECTRIC COMPANY TOPICAL REPORT, "QUALITY MANAGEMENT
SYSTEM (QMS)," REVISION 8.0 (EPID L-2020-TOP-0022)
DATED APRIL 30, 2020

DISTRIBUTION:

PUBLIC
LLPB File Copy
ELenning, NRR
RidsNrrDorLLpb
RidsNrrLADHarrison
RidsOgcMailCenter
RidsACRS_MailCTR
RidsNrrDro
RidsNrrDrolqvb
KKavangh, NRR
DZhang, NRR
RidsNrrDorl
RidsResOd
DMorey, NRR

ADAMS Accession No.: ML20120A538

*by e-mail

OFFICE	DORL/LLPB/PM	DORL/LLPB/LA*	DRO/IQVB/BC*	DORL/LLPB/BC*	DORL/LLPB/PM
NAME	ELenning	DHarrison (LRonewicz for)	KKavanagh	DMorey (MOrenak for)	ELenning
DATE	04/29/2020	04/30/2020	04/30/2020	04/30/2020	04/30/2020

OFFICIAL RECORD COPY



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

REQUESTS FOR ADDITIONAL INFORMATION FOR
TOPICAL REPORT, "QUALITY MANAGEMENT SYSTEM (QMS)," REVISION 8.0
WESTINGHOUSE ELECTRIC COMPANY

By letter dated April 27, 2020 (Agencywide Documents Access and Management System Package Accession No. ML20118C994), Westinghouse Electric Company (Westinghouse) submitted to the U.S. Nuclear Regulatory Commission (NRC) Topical Report, "Quality Management System (QMS)," Revision 8.0. Below are the NRC staff requests for additional information:

- 1) In Section 4.3.1, "General," of the QMS, Westinghouse proposes to include a 25 percent extension to the periodicities of audits or surveys when performance of such activities is not feasible under exigent conditions. Please describe how Westinghouse ensures the applicability of the 25 percent extension is only for exigent conditions and does not create confusion regarding the existing 36-month audit frequency and associated 90-day grace period afforded for emergent administrative issues.

- 2) In Section 4.3.1 of the QMS, Westinghouse states:

The grace period clock under Regulatory Guide 1.28 Rev. 4 can be extend if exigent conditions exist including but not limited to:
a) declaration of a national emergency, b) severe localized or national weather conditions, or c) localized outbreak of a severe health concern to the public. In the case exigent conditions exist, an overall 25% extension to the periodicities of audits or surveys may be exercised when performance of such activities is not feasible.

Please provide more information on the relevancy of referencing the grace period in Regulatory Guide 1.28, Revision 4, because the proposed 25 percent grace period is not an extension of the 90-day grace period for administrative issues, but rather a totally unique grace period to be used only during exigent conditions.

- 3) In Section 4.3.1 of the QMS, Westinghouse identifies three actions (a-c) that need to be taken in order for suppliers in the 25 percent extension to remain on the Westinghouse qualified supplier list. Action item b.3 states, "results of audits from other sources (e.g., customer, American Society of Mechanical Engineers (ASME), NIAC or NRC audits)." The NRC staff considers information from previous NRC inspections is more suitable for supporting the monitoring ongoing and previous supplier performance.

Please provide why inspections were not included in Action item b.3.

Enclosure