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November 18, 1985

United States Nuclear Regulatory Commission
Vendor Program Branch
Division of QA, Vendor & Technical Training Center Programs
Office of Inspection & Enforcement
Attn: Mr. Gary G. Zech, Chief
Washington, DC 20555

Ref: Docket No. 99900081/85-01

RESPONSE TO JULY 8-12 AUDIT REPORT

Gentlemen:

The following responses are identified to directly correspond to the nonconformance items in Appendix A of your subject document.

1. Nonconformance: Licensing and Safety Engineering personnel engaged in performing safety-related computer code calculations are not formally indoctrinated and trained.

ENC Response: A training program for the Licensing and Safety Engineering Section is being developed. This is an ongoing program addressing PWR and BWR analyses. Sessions are scheduled to begin on November 13, 1985, and proceed on a periodic basis. Training sessions will be documented such that specific training is related to individuals.

2. Nonconformance: ENC Failed to comply with the following requirements of Section 3.6 for a coding error discovered by them for St. Lucie, Unit 1.
 - a. Written notice be sent by the cognizant Section Manager to the Manager of Fuel Engineering and Technical Services.
 - b. Formal notification to all affected users.
 - c. Incorporation of a written notice into the Software Department Record (SDR).

ENC Response:

a. When the reporting of the St. Lucie LOCA errors was made to the manager of Fuel Engineering & Technical Services by the manager of Licensing and Safety Engineering, no separate letter was written for the input error. The formal communication addressed the coding misformulation. The error was informally reported, as evidenced in the Hazards Review Board minutes. For future occurrences, a separate letter will be written for each error, as required by XN-NF-608, Rev. 5.

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AN AFFILIATE OF EXXON CORPORATION

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b. A letter notifying every member of the PWR analysis group of the TOODEE2 coding error and the discontinued use of augmentation heat transfer factors has been issued. This letter has also been included in the TOODEE2 SDR.

c. The notices of the TOODEE2 error in the heat transfer coefficient augmentation factor for local peaking has been included in the SDR. Input errors in codes are documented in the design calculation files.

3. Nonconformance: ENC's documentation and independent review of analyses performed in relation to the TOODEE2 computer code was not adequate and failed to satisfy the requirements of Procedure XN-NF-P00,002.

ENC Response: The documentation of the TOODEE2 computer code input data for the St. Lucie Unit 1 ECCS analysis will be improved and an independent review of that documentation performed and documented. This action will be accomplished by February 1, 1986.

4. Nonconformance: ENC Procedure XN-NF-608, Rev. 5, Section 1.2.7, requires that qualification and verification calculations be performed to substantiate computer code modifications. In addition, these calculations shall be included in the SDR.

Contrary to the above, the qualification and verification calculations performed for the UJUL84 version of the TOODEE2 computer code were not included in the SDR, nor were they retrievable.

ENC Response: The qualification and verification calculations performed for the UJUL84 version were checked at the time the calculations were performed. Records of the checks, however, were not retained. Qualification and verification records for TOODEE2/UJUL84 version will be recreated and inserted in the SDR by February 28, 1986.

To prevent recurrences, a checklist is being prepared which clearly identifies what is required in the SDR. The checklist will identify the qualification and verification records which must be incorporated (or referenced) in the SDR. The code developer's manager will use the checklist to identify that the SDR is complete.

5. Nonconformance: During observed analytical test, uranium samples were not held at 900°C for one hour as required by ENC Analytical Procedure P69269.

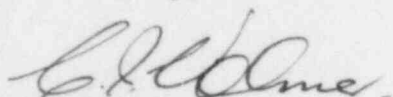
ENC Response: The procedure has been revised to reflect the current practice of raising samples to 900°C and then immediately turning off heat. Tests have shown that the one-hour hold is not necessary to ensure complete oxidation of the sample.

6. Nonconformance: ENC failed to formally approve detection limits and calibration curves for the Quantometer (Analytical Procedure P69268).

ENC Response: This approval has been documented. Also, the procedure has been revised to include an approval form and to change the approver from "Spectroscopist" to "Chemist or Laboratory Manager".

Please call me on 509 375-8257 if you have any questions regarding these responses.

Sincerely,



C.J. Volmer
Manager, Quality Assurance

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