

ARPANSA Regulatory Assessment of Replacement Reactor Construction Application

26 July 2001 – ANSTO Responses

Application document LBD-03

Question reference	Section number and name	Topic	ARPANSA Comment, Issue or Question and ANSTO's Response
A.1.	Cover Letter	States "a separate compliance [report] with the conditions issued by the Minister for the Environment and Heritage will be supplied to Environment Australia in the next few months".	The ANSTO second status report (March 2001) on the Environment Minister's conditions acknowledges there are six conditions that " <i>must be completed prior to the commencement of construction</i> " i.e. the satisfaction of these conditions affects a Licence to Construct. The regulatory assessment process is impaired and delayed without sufficient details on how the applicant has addressed these conditions. Please provide the relevant information.
			Response: All issues requiring ARPANSA review and approval were included in the PSAR. Issues requiring review by the other agencies, identified in 14.3.1 are being progressed in parallel and the review from these agencies will be provided to ARPANSA for information.
A.2.	3.1.1 Organisation of the Project 3.1.2 Project responsibilities	Section 3.1.2 states: "The Safety and Licensing Manager reports functionally to the ANSTO Director, Safety and administratively to the RRRP Project Manager to ensure effective integration of all safety and licensing activities within the RRRP Project Management Team."	ARPANSA notes that in the Application and in the RRRP Quality Manual there is no mention of the authorities and responsibilities of the ANSTO Director Safety. Hence, please explain how the RRRP Safety & Licensing Manager can report functionally to the ANSTO Director Safety and how this ensures "effective integration of all safety and licensing activities within the RRRP Project Management Team". [Note the next issue relates to this issue].
			Response: The process for development of the PSAR requires preparation of the chapter by the identified ANSTO chapter coordinator, review by members of the ANSTO Project Core Team and approval on behalf of the organisation by the Director of Safety, who is identified in the QA system as providing the ANSTO review. This QA procedure will be altered to clarify these roles and provided to ARPANSA.
A.3.	3.1.1 Organisation of the Project 3.1.2 Project responsibilities 3.6 The Quality Management	Approval of PSAR chapters is given under signature of RF Cameron (ANSTO Director Safety Division). Also, during the discussions with the Peer Review Team for the PSAR the RRRP Project Manager indicated that during his absence, the Director, Safety Division acts as project	The Project organisation, responsibilities and quality system do not state or recognise the role, authority or responsibilities of the ANSTO Director Safety. Please explain. Please provide the appropriate written assurance to ARPANSA that the PSAR has been accepted and/or approved by the RRRP Organisation and by ANSTO. This should include explanation of the review and acceptance process related to the design described in the PSAR. Please identify where the responsibilities for approval are identified in the Project Management

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	System	manager.	documents. Please clarify who has authority to deputise for the Project Manager.
			Response: Please see the previous response. The process of acceptance of the design is explained in the project management plan, as outlined in the Application section 4.4.2. A document explaining the deputising arrangements for the Project Manager will be provided.
A.4.	3.1.1 Organisation of the Project	<i>Project Monitoring Group</i> is shown in the organisation diagram, but not explained.	Please explain the role, responsibilities and authorities of the Project Monitoring Group. [Note: it is superficially provided in RRRP 1.2 rev 3 para 5.12]
			Response: The Project Monitoring Group provides the interface between the RRRP and other ANSTO activities, and ensures that interactions between the two are managed. It consists of representatives from all divisions and the RRRP Project Manager. In particular, the group overviews the provision of Principal Furnished Materiel, the progress with the Neutron Beam Instruments Project and is the group reviewing the risk management plan for these interactions.
A.5.	3.6 The Quality Management System	States that “ <i>the replacement reactor quality system has been audited by QAS and has been recommended for certification to ISO 90001:1994</i> ”	Correspondence to ARPANSA from the RRR Project Manager dated 12 May 2001 states that quality certification was achieved 9 May 2001. Why is this not shown in the Application dated 18 May?
			Response: At the time of submission, certification had been recommended but the certificate had not been received from QAS. Hence a definite statement was not made. ANSTO is pleased to confirm the certification, as from 9 May.

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A.6.	4.3.3 Manufacturing and Procurement Phase	States that “The Manufacturing and Procurement Phase is scheduled to commence in <u>April 2001...</u> ” (underlining added) and that this includes manufacture of tanks and vessels (reactor and reflector vessel) and mechanisms (shutdown system control rods). Further the contract master schedule identifies the following Safety Category 1 items planned to commence manufacture before a Construction Licence is issued: Reactor Pool Shell Reflector Vessel & Beam Tubes, Reflector Pool Internal Components, Block embedded Structures & Piping.	<p>ARPANS Regulation 54 is applicable. ARPANSA expects that the construction of any items that are important for safety, and identified in the preliminary safety analysis report, cannot commence before a decision is made by the CEO to grant a Licence to Construct. Further it is expected, as is the current practice for existing nuclear installations, that all Safety Category 1 systems will be subject to a staged approval process and that Safety Category 2 systems may be required to be subject to the process also. Please explain what is intended in section 4.3.3.</p>
			<p>Response: It is ANSTO's intention to comply in full with the requirements of Regulation 54.</p> <p>Sec. 4.3.3 addresses the need to begin certain activities prior to the commencement of site construction and installation activities to maintain the progress in accordance with the Contract Master Schedule (CMS). Long lead items are not unusual in the process of the development of a project.</p> <p>ANSTO has addressed this matter at a number of levels; additional information has been presented to the CEO, ARPANSA by the Executive Director, ANSTO. This information confirms that ANSTO/INVAP will not commence any manufacturing work prior to the issue of the Construction Authorisation, scheduled for February 2002.</p>
A.7.	Attachment 1 – Project Schedule and Contract Master Schedule	The Issuing of a Construction Licence by the CEO of ARPANSA is recorded as a	The anticipated licensing decisions by the CEO of ARPANSA are important developments in the replacement reactor project and effectively constitute hold points for the project. The period of review of the current and any future

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	revision 3	<p>Milestone.</p> <p>Future approvals for safety related items during construction and an Application for Commissioning and Operation are not clearly shown on the schedule or project management plan.</p>	<p>Application by ARPANSA Regulatory Branch and the Decision by the CEO should be shown on the schedule and relevant plans and arrangements as an integral part and on the Critical Path for the project.</p>
			<p>Response: Agreed and these will be shown in future revisions of the schedule.</p>
A.8.	4.4.5 Process audits by ARPANSA	<p>Application mentions "process audits by ARPANSA" and that "ANSTO will provide a high degree of transparency into the process".</p>	<p>Please explain what is intended by "process audits" ?</p> <p>Please identify or outline the proposed procedures and methods for obtaining the stated high degree of transparency.</p> <p>There appears to be no identified safety hold-points for which ARPANSA Regulation 54 would apply and no specific mention of construction safety item approvals in the Application or PSAR. Please identify the items important to safety in the PSAR for which Regulation 54 is expected to apply.</p>
			<p>Response: The term "process audit" is used in a practical sense to say that ARPANSA will have access to ANSTO's activities throughout the construction phase, to observe the effectiveness of the implementation of the processes being adopted, and to audit their effectiveness to the extent you consider appropriate in the circumstances.</p> <p>Transparency will be derived from:</p> <ul style="list-style-type: none"> • regular project meetings being held between ARPANSA and ANSTO staff and project management, • unrestricted access to INVAP project management, • active participation and interaction between ARPANSA and ANSTO/INVAP in the implementation of the Construction Inspection and Test Plan, • ARPANSA observing surveillance and re-certification audits of both

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			<p>ANSTO’s RRRP Phase 3 Quality Management System and the Contract Project Quality Assurance Program. In addition, ANSTO will recommend to INVAP that ARPANSA be invited to all future audits undertaken on the JHEDI quality management system,</p> <ul style="list-style-type: none"> • ANSTO providing ARPANSA with progressively updated information of the Detailed Engineering deliverables being prepared for delivery to ANSTO for review, comment and acceptance– refer the 6 month “rolling window”, and subsequently providing all such deliverables to ARPANSA for review and comment, and • provision to ARPANSA of all formal updates to the Contract Master Schedule. <p>The issue of compliance with ARPANS Regulation 54 has already been addressed in interactions between ARPANSA and ANSTO. Further issues to be addressed include the classification of the safety systems identified in the PSAR and the nomination of ARPANSA sponsored hold points related primarily to the Class 1 safety systems.</p>