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IMMEDIATE PLACEMENT IN THE PUBLIC DOMAIN**

*This form is to be filled out (typed or hand-printed) by the person who announced the meeting (i.e., the person who issued the meeting notice). The completed form, and the attached copy of meeting handout materials, will be sent to the Document Control Desk on the same day of the meeting; under no circumstances will this be done later than the working day after the meeting.  
Do not include proprietary materials.*

DATE OF MEETING

09/03/2003

The attached document(s), which was/were handed out in this meeting, is/are to be placed in the public domain as soon as possible. The minutes of the meeting will be issued in the near future. Following are administrative details regarding this meeting:

Docket Number(s)

Project 719

Plant/Facility Name

North Anna Early Site Permit Application

TAC Number(s) (if available)

MB5383

Reference Meeting Notice

ML032240484

Purpose of Meeting  
(copy from meeting notice)

Discuss plans for NRC staff to conduct inspections of

Dominion Energy quality assurance measures in

support of its prospective early site permit application

NAME OF PERSON WHO ISSUED MEETING NOTICE

**Michael L Scott**

TITLE

**Project Manager**

OFFICE

**NRR**

DIVISION

**DRIP**

BRANCH

**RNRP**

Distribution of this form and attachments:

Docket File/Central File

**PUBLIC**



# **Pre-Application Meeting for Early Site Permit (ESP) Quality Assurance (QA) Review**

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Kevin Coyne

Paul Prescott

Quality and Maintenance Section

Emergency Preparedness and Plant Support Branch (IEPB)

Office of Nuclear Reactor Regulation

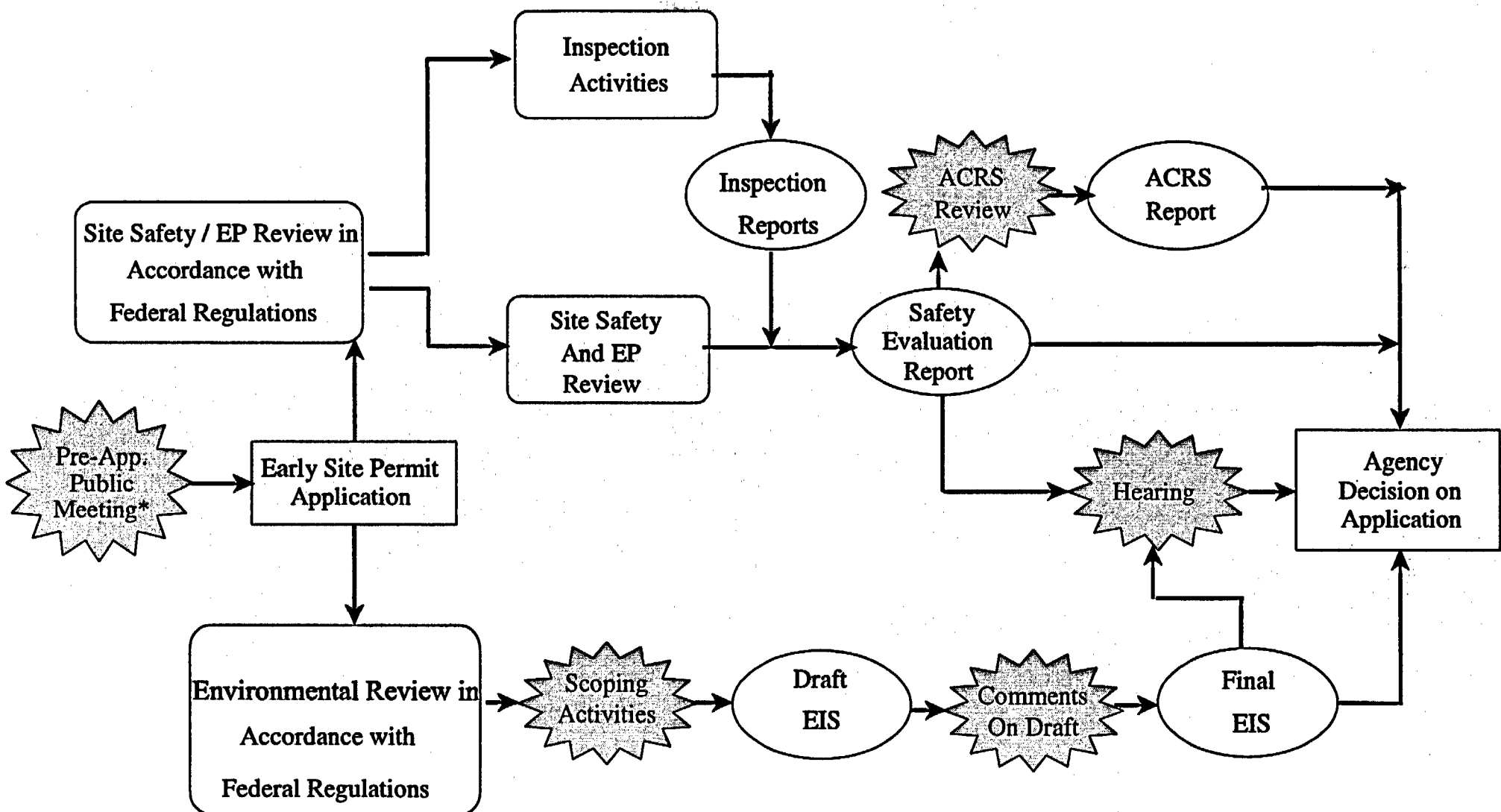


# Overview:

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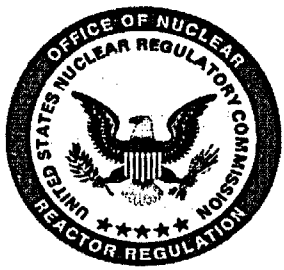
- **Purpose of the Meeting:**
  - ▶ **Describe the process used to review QA measures related to an ESP application.**
  - ▶ **Provide opportunity to discuss QA review process and respond to questions.**

# Early Site Permit Review Process



*Formal Public Participation*

*\* Not required*



# Overview

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- **A Draft Review Standard (RS-002) was developed and issued for interim use.**
- **A new Section of RS-002 was developed to review ESP QA measures (Section 17.1.1).**
- **A new Inspection Manual Chapter (IMC-2501) and supporting Inspection Procedures were developed.**



# Quality Assurance Approach

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- **10 CFR Part 52 does not require a Part 50 Appendix B program.**
- **In general, 10 CFR Part 52.39 provides finality for issues resolved at the ESP stage.**

**The staff must ensure site characterization data is accurate, reliable and can support the design and operation of future systems, structures and components (SSCs) important to safety.**



# IMC-2501 Inspection Program for ESP

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## Overview

- Establishes guidance for inspection of activities associated with the ESP application.
- Used in conjunction with, and references RS-002, Section 17.1.1.
- Purpose is to verify that data and analyses supporting the ESP application are supported by an adequate QA framework.



# IMC-2501 Inspection Program for ESP

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## Continued

- Determine if applicant's QA measures are "equivalent in substance" to Appendix B.
- Inspection reviews data collection, analysis and evaluation methodologies.
- Key quality elements include data integrity, traceability, document control, evaluation, and record storage.
- Intent is to not apply operating reactor QA program to ESP (e.g., Reg. Guides, ANSI Standards, etc.).
- Deficiencies in QA measures, if any cited based on lack of assurance of the integrity and reliability of the data .

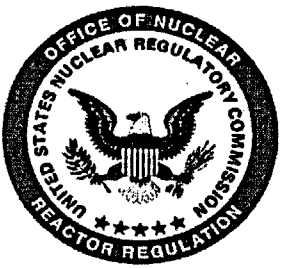




## **Section 17.1.1 “Early Site Permit Quality Assurance Controls”**

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- **Purpose is to determine if the applicant has included within the scope of QA measures, activities that would affect SSCs important to safety.**
- **Explains the Pre-Docketing and Post-Docketing activities.**
- **IMC-2501 inspection activities will support development of ESP safety evaluation report (SER).**



## **Section 17.1.1 “Early Site Permit Quality Assurance Controls”**

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- **The SER review and evaluation will determine:**
  - **the organizations and persons performing QA functions had independence and authority to be effective;**
  - **QA procedures and controls, when properly implemented, were equivalent in substance to the criteria of Appendix B and conform to the guidance in RS-002, Section 17.1.1; and**
  - **QA measures were applied to all ESP activities that establish information for: (1) the design and construction of future SSCs important to safety; or (2) the establishment of site characteristics for comparison to the values of site parameters postulated in a certified design.**

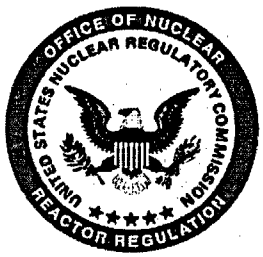


# **Section 17.1.1 “Early Site Permit Quality Assurance Controls”**

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## **Focus Areas of Inspection**

- **Procurement**
- **Test / Inspection Controls**
- **Control of Site Characterization Data and Analyses Activities**
- **Procedures (QA and Technical)**
- **Record Retention**
- **Training**

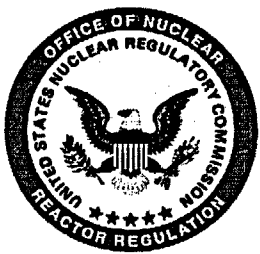


# **IMC-2501 QA-Related Inspection Procedures**

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## **Inspection Procedures**

- **“Pre-Docketing Early Site Permit Pre-Application Quality Assurance Controls Meeting”  
(IP35002A)**
- **“Pre-Application Early Site Permit Quality Assurance Controls Inspection”  
(IP 35004A)**
- **“Early Site Permit Quality Assurance Controls Assessment and Conclusion”  
(IP 35006A)**
- **“Post-Application Early Site Permit Quality Assurance Controls Inspection”  
(IP 35012A)**



## **Substantive Findings**

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- **A QA finding is considered substantive if:**
  - **an activity important to safety associated with site characterization, data or analysis was not performed;**
  - **an activity important to safety associated with site characterization, data or analysis was performed incorrectly; or**
  - **the applicant lacks objective evidence to establish that the activity important to safety associated with site characterization, data or analysis was adequately completed.**



# QA Inspections

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## ■ Inspections:

- ▶ To ascertain QA controls, for input to the SER;
- ▶ Led by Regional inspectors;
- ▶ Technical support provided from NRR; and,
- ▶ Conducted during periods of significant site characterization activities.

**Quality Assurance Audit Documentation Request  
for the Dominion Early Site Permit Application**

Dominion Energy, Inc. (Dominion) is requested to provide the following information to support the U.S. Nuclear Regulatory Commission (NRC) staff's quality assurance (QA) controls audit in support of the early site permit (ESP) application review.

1. A description of Dominion's implemented QA controls applied to site characterization data collection and analysis.
2. Copies of Dominion's procedures used to implement QA controls.
3. A description and schedule (or dates, for items previously performed) of significant site activities, evaluations, analyses, and milestones supporting the ESP application.
4. If published data sources will be used to collect site data, rather than the performance of measurement, a description of these data sources (e.g., meteorological, seismic, etc).
5. Identification of contractors used for performing ESP-related activities and for what purpose, and description of quality controls applied to contractor activities and procedures for implementing those controls.
6. Training lesson plans developed for Dominion's staff related to ESP activities and associated training records, and similar records for contractors.
7. Records of audits and self-assessments associated with site characterization and ESP application development.

In addition to the above items, the NRC team will need access to data collected and the controls applied for review and inspection. The team may request copies of some data to carry back for in-office review. If the information is stored on a computer, the staff will work with Dominion to determine how the staff can obtain requested data.