

January 2, 2004

Mr. Randall L. Kurtz
Quality Assurance Manager
Sargent & Lundy, LLC
55 East Monroe Street
Chicago, IL 60603-5780

SUBJECT: REVIEW OF SARGENT & LUNDY (S&L) NUCLEAR QUALITY ASSURANCE
(QA) PROGRAM (TAC NO. MB9665)

Dear Mr. Kurtz:

On April 21, 2003, you submitted Revision 17 of the S&L Topical Report (TR) SL-TR-1A, "Nuclear Quality Assurance Program" to the NRC staff for review. The staff held a conference call with S&L on November 5, 2003, to discuss these proposed changes, and also to request additional information regarding the process qualification system. In addition, the staff requested that S&L revise Section 16, "Corrective Action," to include reference to nonconforming items and assure adequate compliance with 10 CFR Part 21. By letter dated November 13, 2003, S&L provided the additional supporting information and a revision to Section 16 as requested.

The NRC staff has completed its review of Revision 17 to TR SL-TR-1A. Revision 17 contains several changes that are classified as reductions in commitment in accordance with 10 CFR 50.54(a)(3). These changes include:

1. Withdrawal of the commitment to ANSI N45.2 and its daughter standards, and the adoption of Regulatory Guide (RG) 1.28, "Quality Assurance Program Requirements (Design and Construction)" and ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications."
2. Commitment to Regulatory Issue Summary 2000-18, "Guidance on Managing Quality Assurance Records in Electronic Media," (RIS-2000-18) in its entirety, which provides guidance on storing and maintaining QA records in electronic media, as stipulated by 10 CFR 50.71(d)(1). This guidance applies to QA records that are subject to the requirements of Criterion XVII of Appendix B.
3. Revision to the system for personnel qualification, certification, and training which is based on a system of processes and process qualifications.
4. Revision to the corrective action process to be based on a performance improvement process (PIP).

With respect to the changes which withdraw commitment to the ANSI N45.2 standards and adoption of the RG 1.28 and NQA-1-1994, the staff has reviewed and accepted similar changes previously for NRC license holders under 10 CFR Part 50. Most recently, this revision was

approved on December 24, 2002, for implementation in the Exelon/Amergen Plants (Accession No. ML023440300). The 1994 edition of the ASME NQA has consolidated NQA-1 and NQA-2 effective documents into a single multi-part document, and the restructuring of its format facilitates the use of various parts of the standards. The basic requirements from former editions, as defined therein, however, are substantially unchanged, and is not affected by S&L's adoption of NQA-1-1994.

With respect to the adoption of RIS-2000-18 in its entirety, which provides guidance on storing and maintaining QA records in electronic media, as stipulated by 10 CFR 50.71(d)(1), the staff has previously approved this request for S&L in a letter dated March 1, 2002 (Accession No. ML020590149). Inclusion of additional RIS-2000-18 guidance in Revision 17 to TR SL-TR-1A is consistent with the staff's prior review activities.

With respect to changes to the personnel qualification certification and training program at S&L, the staff has reviewed the process descriptions, individual training records, and standard operating procedures provided by S&L to support the requested revision. The staff finds that the revised training and qualification process is consistent with the requirements of 10 CFR 50.120 and 10 CFR 55.4, as well as the guidance in ANS 3.1-1993 regarding qualification of contractor personnel and establishment of a program based on the five elements of a systems approach to training, as defined in 10 CFR 55.4.

Additionally, with regard to revision of the corrective action program to incorporate a PIP process, the staff has reviewed the proposed revision to Section 16, "Corrective Action," of Revision 17 of TR SL-TR-1A, and has confirmed that the fundamental corrective action activities are consistent with the requirements of 10 CFR Part 50, Appendix B, Criterion XVI. Specifically, these activities include: (1) a review of conditions adverse to quality by an oversight team consisting of various levels of S&L management, (2) a defined process for the initiation, disposition, and closure of issues identified as adverse to quality, including documentation of such activities, and (3) verification that corrective actions are implemented and evaluated to assure recurrence of the conditions adverse to quality are precluded.

Based on our review of the areas mentioned above, the NRC finds that Revision 17 to TR SL-TR-1A meets the requirements of Appendix B to 10 CFR Part 50, and is therefore acceptable. If you have further questions on this matter, please contact Mr. Bo Pham at 301-415-8450.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

approved on December 24, 2002, for implementation in the Exelon/Amergen Plants (Accession No. ML023440300). The 1994 edition of the ASME NQA has consolidated NQA-1 and NQA-2 effective documents into a single multi-part document, and the restructuring of its format facilitates the use of various parts of the standards. The basic requirements from former editions, as defined therein, however, are substantially unchanged, and is not affected by S&L's adoption of NQA-1-1994.

With respect to the adoption of RIS-2000-18 in its entirety, which provides guidance on storing and maintaining QA records in electronic media, as stipulated by 10 CFR 50.71(d)(1), the staff has previously approved this request for S&L in a letter dated March 1, 2002 (Accession No. ML020590149). Inclusion of additional RIS-2000-18 guidance in Revision 17 to TR SL-TR-1A is consistent with the staff's prior review activities.

With respect to changes to the personnel qualification certification and training program at S&L, the staff has reviewed the process descriptions, individual training records, and standard operating procedures provided by S&L to support the requested revision. The staff finds that the revised training and qualification process is consistent with the requirements of 10 CFR 50.120 and 10 CFR 55.4, as well as the guidance in ANS 3.1-1993 regarding qualification of contractor personnel and establishment of a program based on the five elements of a systems approach to training, as defined in 10 CFR 55.4.

Additionally, with regard to revision of the corrective action program to incorporate a PIP process, the staff has reviewed the proposed revision to Section 16, "Corrective Action," of Revision 17 of TR SL-TR-1A, and has confirmed that the fundamental corrective action activities are consistent with the requirements of 10 CFR Part 50, Appendix B, Criterion XVI. Specifically, these activities include: (1) a review of conditions adverse to quality by a oversight team consisting of various levels of S&L management, (2) a defined process for the initiation, disposition, and closure of issues identified as adverse to quality, including documentation of such activities, and (3) verification that corrective actions are implemented and evaluated to assure recurrence of the conditions adverse to quality are precluded.

Based on our review of the areas mentioned above, the NRC finds that Revision 17 to TR SL-TR-1A meets the requirements of Appendix B to 10 CFR Part 50, and is therefore acceptable. If you have further questions on this matter, please contact Mr. Bo Pham at 301-415-8450.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

DISTRIBUTION:

PUBLIC	DThatcher
PDIV-2 Reading	GGalletti
HBerkow (RidsNrrDlpmLpdiv)	RidsOgcRp
BPham (RidsNrrPMBPham)	RidsAcrcAcnwMailCenter
EPeyton (RidsNrrLAEPeyton)	

ACCESSION NO.: ML040020463

* Previously concurred

OFFICE	PDIV-2/PM	PDIV-2/LA	*IEPB/SC	PDIV-2/SC
NAME	BPham	EPeyton	DThatcher	SDembek
DATE	12/31/03	12/31/03	12/22/03	1/2/04