

12 QUALITY ASSURANCE EVALUATION

12.1 Conduct of Review

The purpose of the Quality Assurance review is to determine whether Pacific Gas and Electric Company (PG&E) has a quality assurance (QA) program that complies with the requirements of 10 CFR Part 72, Subpart G. The basis for that determination is a review and evaluation of the applicant's QA program submitted as part of the application in accordance with 10 CFR 72.24(n).

Paragraph (b) of 10 CFR 72.140 states in part, that each licensee shall establish, maintain, and execute a QA program satisfying each of the applicable criteria of 10 CFR Part 72, Subpart G. Paragraph (d) of 10 CFR 72.140 states that a Commission-approved QA program which satisfies the applicable criteria of Appendix B of 10 CFR Part 50 and which is established, maintained, and executed with regard to an ISFSI will be accepted as satisfying the requirements of 10 CFR 72.140(b).

The following areas were reviewed by the staff:

- QA Organization (10 CFR 72.142)
- QA Program (10 CFR 72.144)
- Design Control (10 CFR 72.146)
- Procurement Document Control (10 CFR 72.148)
- Instructions, Procedures and Drawings (10 CFR 72.150)
- Document Control (10 CFR 72.152)
- Control of Purchased Material, Equipment and Services (10 CFR 72.154)
- Identification and Control of Materials, Parts, and Components (10 CFR 72.156)
- Control of Special Processes (10 CFR 72.158)
- Licensee Inspection (10 CFR 72.160)
- Test Control (10 CFR 72.162)
- Control of Measuring and Test Equipment (10 CFR 72.164)
- Handling, Storage, and Shipping Control (10 CFR 72.166)
- Inspection, Test, and Operating Status (10 CFR 72.168)
- Nonconforming Materials, Parts or Components (10 CFR 72.170)
- Corrective Action (10 CFR 72.172)
- Quality Assurance Records (10 CFR 72.174)
- Audits (10 CFR 72.176)

12.2 Evaluation

PG&E is currently licensed under 10 CFR 50 to operate the Diablo Canyon Power Plant (DCPP), Units 1 and 2, and has an NRC-approved quality assurance program meeting the requirements of 10 CFR Part 50, Appendix B. In Chapter 11 of the Diablo Canyon ISFSI Safety Analysis Report, PG&E states the governing document for the ISFSI QA program is the DCPP Quality Assurance Program, as described in Chapter 17 of the DCPP Final Safety Analysis Report (FSAR) Update (Pacific Gas and Electric Company, 2001). PG&E further states this QA program applies to the design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, modification, and

decommissioning of ISFSI structures, systems, and components that are important to safety, and to managerial and administrative controls used to ensure safe ISFSI operation.

Given that the existing approved QA program satisfies Appendix B to 10 CFR Part 50 and that PG&E will apply that program to the ISFSI, the staff concludes that PG&E has met the conditions of 10 CFR 72.140(d) and, therefore, satisfies the requirements of 10 CFR 72.140(b).

The staff reviewed Chapter 17, "Quality Assurance," of the DCPD FSAR Update, and concludes that the description of PG&E's QA program for the Diablo Canyon ISFSI satisfies the requirements of 10 CFR Part 72, Subpart G. The QA program is comprehensive and will provide adequate control over activities affecting quality related to the ISFSI.

12.3 Findings

The staff made the following findings regarding the QA program:

The QA program describes requirements, procedures, and controls that when properly implemented, comply with the requirements of 10 CFR 72, Subpart G.

The QA program covers activities affecting SSCs important-to-safety as identified in Section 4.5 of the SAR.

The organizations and persons performing QA functions have the independence and authority to perform their functions without undue influence from those directly responsible for costs and schedules.

The applicant's description of the QA program is in compliance with applicable NRC regulations and industry standards, and the QA program can be implemented for the design, fabrication and construction, operation, and decommissioning phases of the installation's life cycle.

12.4 References

Pacific Gas and Electric Company. *Diablo Canyon Power Plant Units 1 & 2 Final Safety Analysis Report Update, Revision 14*. Avila Beach, CA: Pacific Gas and Electric Company. November 2001.