

**From:** Nanette Gilles  
**To:** Eddie Grant; Marilyn Kray; Tom Mundy  
**Date:** Fri, Nov 21, 2003 11:30 AM  
**Subject:** Request for Additional Information-QA

The attached is an advanced copy of a request for additional information regarding ESP quality assurance measures. The information requested will assist the NRC staff in the review of Exelon's ESP application and will help to prepare the inspectors who will be performing the QA inspection tentatively scheduled for January 12-16, 2004. It is not necessary to wait until you have all of the requested information to respond. If some of the information is available before other portions, it would be helpful to the staff if you sent that information as soon as it was available. Formal transmittal of the RAI via letter will follow. Let me know if you have any questions.

**CC:** Dale Thatcher; Kenneth Heck; Laura Dudes; Michael Scott; Paul Prescott;  
Ronald Gardner; Stephen Koenick; Thomas Foley

**Mail Envelope Properties**

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**Subject:** Request for Additional Information-QA  
**Creation Date:** Fri, Nov 21, 2003 11:30 AM  
**From:** Nanette Gilles

**Created By:** NVG@nrc.gov

| <b>Recipients</b>           | <b>Action</b> | <b>Date &amp; Time</b> |
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RAI letter 1-QA.wpd  
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**Size**

49853  
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November 21, 2003

Ms. Marilyn Kray  
Vice President, Special Projects  
Exelon Generation  
200 Exelon Way, KSA3-E  
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 1 - EXELON EARLY  
SITE PERMIT APPLICATION FOR THE CLINTON ESP SITE ON QUALITY  
ASSURANCE MEASURES (TAC NO. MC1122)

Dear Ms. Kray:

By letter dated September 25, 2003, Exelon Generation Company, LLC (Exelon) submitted its application for an early site permit (ESP) for the Clinton ESP site.

The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of the Site Safety Analysis Report in your ESP application to ensure that the information is sufficiently complete to enable the NRC staff to reach a final conclusion on all safety questions associated with the site before the ESP is issued.

The NRC staff has determined that additional information is necessary to continue the review. The topic covered in the request for additional information (RAI) contained in Enclosure 1 is quality assurance (QA) measures applied to ESP activities. This RAI was sent to you via electronic mail on November, 2003. Receipt of a response within 30 days of the date of this letter will support the NRC staff's QA controls inspection tentatively scheduled for January 12-16, 2004. Note that failure to provide a response in a timely fashion may result in a delay of the inspection.

If you have any questions or comments concerning this matter, you may contact me at (301) 415-1180 or [nvg@nrc.gov](mailto:nvg@nrc.gov).

Sincerely,

*/RA/*

Nanette V. Gilles, Exelon ESP Project Manager

New Reactors Section

New, Research and Test Reactors Program

Division of Regulatory Improvement Programs

Office of Nuclear Reactor Regulation

November 21, 2003

Docket No. 52-007

Enclosure: As stated

cc: See next page

November 21, 2003

Ms. Marilyn Kray  
Vice President, Special Projects  
Exelon Generation  
200 Exelon Way, KSA3-E  
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 1 -  
EXELON EARLY SITE PERMIT APPLICATION FOR THE  
CLINTON ESP SITE ON QUALITY ASSURANCE MEASURES  
(TAC NO. MC1122)

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If you have any questions or comments concerning this matter, you may contact me at (301) 415-1180 or [nvg@nrc.gov](mailto:nvg@nrc.gov).

Sincerely,

**/RA/**

Nanette V. Gilles, Exelon ESP Project Manager

New Reactors Section

New, Research and Test Reactors Program

Division of Regulatory Improvement Programs

Office of Nuclear Reactor Regulation

Docket No. 52-007

Enclosure: As stated

cc: See next page

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML042300813.wpd

November 21, 2003

ACCESSION NO. ML033210018

|        |          |           |         |
|--------|----------|-----------|---------|
| OFFICE | RNRP/PM  | IEPB/SC   | RNRP/SC |
| NAME   | NGilles  | DThatcher | LDudes  |
| DATE   | 11/20/03 | 11/ /03   | 11/ /03 |

**OFFICIAL RECORD COPY**

Distribution for Request For Additional Information Letter No. 1 dated 11/21/03

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PPrescott

KHeck

DThatcher

TKenyon

TQuay

Request for Additional Information (RAI)  
Exelon Early Site Permit (ESP) Application for the Clinton ESP Site

RAI 17.1.1-1. Quality Assurance Measures Applied to ESP Activities

In order to ensure the integrity and reliability of site data obtained in support of design or operation of future systems, structures or components important to safety, the staff will review quality assurance (QA) measures applied to the development of information supporting the ESP application. The applicant is expected to implement QA measures equivalent in substance to the measures described in Appendix B to 10 CFR Part 50. Section 17.1.1, "Early Site Permit Quality Assurance Controls," of Review Standard RS-002, "Processing Applications for Early Site Permits," describes the methodology employed by the staff to review and evaluate the description of QA measures applied by the applicant to ESP activities. Consistent with the staff position described above, please describe the QA measures applied to Exelon's ESP activities. Your description should be of sufficient detail to support staff review of your QA measures in accordance with Section 17.1.1 of RS-002 and should contain the following information:

1. A description of Exelon's implemented QA measures applied to site characterization data collection and analysis.
2. Copies of Exelon's procedures used to implement QA measures. These should include procedures/instructions referenced by the Exelon QA program document and procedures used by Exelon for supplier qualification.
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 measurements, include a description of these data sources (e.g., meteorological, seismic, etc), and include a description of QA measures used to validate and control data obtained from existing sites or published sources.
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. Documentation should include copies of purchase orders, description of work scope and quality requirements, QA evaluations, and supplier audits.
6. Training lesson plans developed for Exelon'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.
8. Copies of completed test/data collection procedures for site characterization testing/studies.



Exelon ESP

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**DOCUMENT NAME:** C:\ORPCheckout\FileNET\ML042300813.wpd

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EXELON EARLY SITE PERMIT APPLICATION FOR THE  
CLINTON ESP SITE ON QUALITY ASSURANCE MEASURES  
(TAC NO. MC1122)

**ORIGINATOR:** N. Gilles

**SECRETARY:** C. Nagel

**DATE:** September 3, 2004

### ●●● ROUTING LIST ●●●

|    | NAME        | DATE  |
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| 2. | D. Thatcher | / /03 |
| 3. | L. Dudes    | / /03 |
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