

ATTACHMENT 2

VIRGINIA ELECTRIC AND POWER COMPANY
DOMINION NUCLEAR CONNECTICUT, INC.
SURRY POWER STATION UNITS 1 AND 2 AND ISFSI
NORTH ANNA POWER STATION UNITS 1 AND 2 AND ISFSI
MILLSTONE POWER STATION UNITS 1, 2 AND 3 AND ISFSI
ASSOCIATED RADIOACTIVE MATERIAL PACKAGES
NUCLEAR FACILITY QUALITY ASSURANCE PROGRAM DESCRIPTION
TOPICAL REPORT DOM-QA-1, REVISION 0

AUGUST 24, 2004

DISCUSSION OF CHANGES TO CURRENT QA PROGRAM
DESCRIPTIONS FOR THE ABOVE DOMINION FACILITIES

24 PAGES FOLLOW

DISCUSSION OF CHANGES

Introduction

Pursuant to 10 CFR 50.54(a), Dominion requests review and approval of a consolidated Quality Assurance Program Description (QAPD) designated as DOM-QA-1, Revision 0. This change addresses an expanded scope of the current Quality Assurance Programs to include activities during all phases of facility life (siting, design, construction, operation, and decommissioning) for Dominion's nuclear facilities. Therefore, the entire program is being submitted as a "Reduction in Commitment" under 10 CFR 50.54(a)(4) which requires "Changes to the quality assurance program description that do reduce the commitments must be submitted to the NRC and receive NRC approval prior to implementation." However, many of the changes meet the requirements of 10 CFR 50.54(a)(3), in that they have been previously reviewed and approved by the NRC as documented in correspondence related to the approval of the existing Dominion QA programs or through SERs prepared for other utilities, or simply eliminate information that duplicates the requirements of the standards. The purpose of the consolidation is to develop one common Quality Assurance Program that is applicable to all Dominion's nuclear facilities, including power plants and Independent Spent Fuel Storage Installations (ISFSIs). The consolidated program provides a basis for establishing common practices among sites and readies Dominion for additional acquisitions, further siting activities and new construction, as well as decommissioning activities. The consolidated program meets the criteria of 10 CFR 50, Appendix B, and other current NRC regulations for quality assurance at nuclear facilities.

Background

Consistent with 10 CFR 50, Appendix B, the Quality Assurance Program Description(s) were previously contained in a Topical Report as Chapter 17.2 of the UFSAR for both North Anna and Surry Power Stations, and the Quality Assurance Program Topical Report (QAP) for Millstone Power Station. These current programs governed the operations phase activities for the North Anna and Surry Power Stations and their associated ISFSIs, the Millstone Power Station Units 2 and 3, plus the decommissioning activities for Millstone Power Station Unit 1. The proposed QAPD is a separate Topical Report, that will be referenced in Chapter 17 (or other appropriate chapter) of the applicable facility Safety Analysis Report. In consolidating the current programs, the QAPD is a completely new document in structure compared to the previous programs, therefore no marked up copy is being provided.

In order to evaluate the acceptability of the change from the requirements of the previous ANSI N45.2 series standards to NQA-1 a side-by-side comparison was performed of the requirements. This comparison and corresponding evaluation is being included as supporting information for the review and approval of DOM-QA-1.

In drafting the QAPD, consideration was given to the NRC Standard Review Plans (NUREG-0800, Chapters 17.1, 17.2, and 17.3) governing the content of Quality Assurance programs and the draft regulatory guidance for Early Site Permit QA Controls (RS-002). Since the existing facilities at Dominion were all based on QA programs written to the structure of SRP-17.1 and 17.2, and this structure that follows the specific outline of 10 CFR 50, Appendix B, is embedded

into the implementing procedures, the decision was made to continue with that format, rather than convert to the format presented in SRP-17.3. However, since SRP-17.3 was developed on the basis of a program that follows NQA-1, it was used to determine the appropriate Regulatory Guidance that applies to the Dominion QA program based on NQA-1 as well as providing other useful insight into QA program requirements. It is also noted that the applicable QA requirements from 10 CFR Parts 71 and 72 follow the same outline as Appendix B to Part 50.

The QAPD, upon appropriate approval, will apply to activities important to safety during all phases of the nuclear facilities (power plants and ISFSIs) including siting, design, construction, operations, and decommissioning. Additional information is included throughout the program as applicable for initial start-up, design and construction issues to address potential new facilities, including nuclear power plants and ISFSIs.

Some changes and clarifications were made to the QAPD content as compared to the former separate Quality Assurance Programs and some exceptions have been carried over from previously approved Quality Assurance Programs and License Amendments, as described in the following paragraphs. The most notable changes include:

- Committing to ANSI/ASME NQA-1-1994 as the basic QA Standard as a replacement for the previous ANSI N45.2 series of standards.
- Committing to establish and implement administrative controls and QA requirements within the QAPD for the operating phase activities that are consistent with the guidance of Regulatory Guide 1.33 rather than through a specific commitment to ANSI N18.7-1976/ANS-3.2.
- The use of generic descriptions for implementing programs based more on the function or objective rather than the specific nomenclature used at the facilities, since these program titles vary between locations.
- The use of generic functional descriptions of the organization rather than specific titles and the use of organization charts to depict the reporting relationships.

Discussion

Dominion will use ANSI/ASME NQA-1-1994 as the principal quality assurance standard to satisfy the requirements of 10 CFR 50, Appendix B. NQA-1, Parts I and II have incorporated and updated the requirements from the earlier N45.2 standard and its daughters. For the most part, where the requirements have been updated, they include the earlier Regulatory Positions from the Regulatory Guides that endorsed those standards. The QAPD expounds upon, or contains alternative methods from those described in NQA-1 to ensure the requirements of 10 CFR 50, Appendix B are satisfactorily implemented.

10 CFR 50.54(a)(3)(i) allows “The use of a QA standard approved by the NRC which is more recent than the QA standard in the licensee's current QA program at the time of the change.” Whereas the NRC has not yet specifically endorsed NQA-1-1994 in their Regulatory Guides, Regulatory Guide 1.28, Revision 3, dated August 1985, endorsed NQA-1-1983. NRC correspondence and related NRC Safety Evaluation Report (SER) dated December 24, 2002, for approval of Revision 70 of Quality Assurance Program Topical Report EGC-1A, for the EXELON/AMERGEN Plants, subsection 3.2.1, determined that the requirements of the 1983

and 1994 Editions of NQA-1 are equivalent. Based on the related NRC Safety Evaluation, Dominion's use of NQA-1-1994 is consistent with 10 CFR 50.54(3)(ii), which states in part "The use of a quality assurance alternative or exception approved by an NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility," the NRC has approved the use of NQA-1-1994. Exelon had submitted a comparison of NQA-1-1983 with NQA-1-1994, used as part of the basis for NRC approval, which applies to Dominion's QAPD. In addition, Dominion prepared tables to compare the ANSI N45.2 and daughter standards and ANSI N18.7 standard with NQA-1-1994. (See Enclosures 3 and 4.)

The Organization is described by functions with generic titles for responsible individuals, consistent with the current 50.54(a)(3)(iii), which states: "The use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles." Reporting relationships were eliminated from the text, as the organizational charts in Appendix A describe them, consistent with 50.54(a)(3)(iv): "The use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternately, the use of descriptive text." These generic titles and functional descriptions are used throughout the QAPD.

In accordance with 10 CFR 50.54(a)(3)(v), which allows: "The elimination of quality assurance program information that duplicates language in quality assurance regulatory guides and quality assurance standards to which the licensee is committed," each section in the new QAPD contains a "Quality Standard Reference" which describes applicable commitments to related NQA-1-1994 sections. The Quality Standard referenced in each section will be reviewed in addition to the QAPD when determining station quality requirements. Information previously covered in the QA Program Topical Reports, which is more appropriately covered in implementing procedures is no longer contained in the QAPD and will be addressed in related implementing documents. For example, Design Control details are described only above those stated in NQA-1 or other QAPD sections. The "design control program" is addressed generically, not as a specific program. References to site-specific details, such as the Millstone "Materials, Equipment, and Parts List (MEPL)" or the VA Station "Q-List" are eliminated from the QAPD and will be addressed in related implementing procedures.

Reference to specific groups, such as Nuclear Oversight, or other inspection personnel, that may preclude different facility inspection programs have been eliminated from the QAPD to allow those facilities to follow their site specific inspection process. The requirements to use trained and qualified personnel in planning and performing inspections are retained and applied to the various groups responsible for these activities. Implementing procedures contain the specific description of the various inspection programs for the facilities including Quality Control inspections, Supplier surveillance and inspections, ISI Visual Testing 1, 2, and 3, and so forth.

The current North Anna and Surry QA Program Topical Report, Appendix B consists of a List of Tables:

- (1) 17.2-0, "Conformance of the Company's Operational Quality Assurance Program to NRC Regulatory Guides and ANSI Standards," is addressed in the consolidated QAPD, Appendix C.

- (2) 17.2-1, "Relationship of the Company's Operational Quality Assurance Program to Appendix B, 10 CFR 50," was eliminated from QAPD as not required by current or proposed regulations. As stated in the introduction to the QAPD, the document is formatted to follow the 18 Criteria of 10 CFR 50, Appendix B.
- (3) 17.2-2, "Records Retention Requirements," identified the record types and retention periods for operational phase activities. Record types and retention periods are addressed in the Company's commitment to Regulatory Guide 1.28 and those operational phase activities not addressed by that guidance are addressed in Appendix E of the proposed QAPD.

Regarding the operating facility organizational structure and the selection, training, and qualification of personnel, the terms "onsite" and "offsite" personnel were used in the existing QA Topical Reports since they are used in the QA standards. These terms frequently caused confusion since the offsite functions may in fact be performed by personnel that are physically located at the site rather than a remote corporate office. Throughout the proposed QAPD, the terms used are operations groups and support groups to alleviate the confusion if a support group is located at a site. This allows for a consistent description and charting of the organizational structure without having to call out specific locations. More detailed information regarding the physical location of groups and individuals fulfilling the functions described in the QAPD will be maintained in Company documents available at the various sites.

The management and independent review activities are described in terms of minimum requirements for review functions, committee size and quorum that are based on the requirements contained in ANSI N18.7-1979/ANS-3.2. The committees functioning at the station level had different numbers for what comprised the committee and a quorum of the committee. This change allows for those differences while ensuring that the committees continue to function within the NRC regulatory guidance. To facilitate the common description, the qualification requirements for review personnel are being updated to ANS-3.1-1993 as endorsed by Regulatory Guide 1.8, Revision 3. The overall review functions remain the same in that: (1) each facility continues to have a review group with engineering experience, and a committee to review specific items and advise the site executive; and (2) the corporate committee reviews the facility review functions and independent audits and advises the chief nuclear officer.

Evaluation of Alternatives to Committed Standards for the Consolidated QAPD

The following changes to personnel qualification requirements have either been carried forward from the existing programs or are proposed in the QAPD.

ANSI N18.1-1971, subsection 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license." The following alternative requirement is contained in the QAPD: "The individual filling the role of Operations Manager will meet the requirements of subsection 4.2.2, "Operations Manager" of ANSI/ANS-3.1-1993, subject to Regulatory Position C.2.5 of NRC Regulatory Guide 1.8, Revision 3. Since the Operations Middle Manager function is not discussed in ANSI N18.1-1971, the individual filling this role (e.g. Supervisor - Shift Operations) will meet the requirements for Operations Manager of ANSI N18.1-1971, including holding a Senior Operator's License." This alternative was modified

from the current Topical Report to use the newer endorsed ANSI Standard. This alternative is acceptable based on NRC guidance contained in Regulatory Guide 1.8, Revision 3. A comparable alternative was previously approved by the NRC through license amendments 178 and 190 for the Millstone Power Station Unit 2 and amendment 132 for the Millstone Power Station Unit 3.

ANSI N18.1-1971, subsection 4.3.1, states in part, “A Supervisor (requiring an AEC license) shall have a minimum of a high school diploma or equivalent, and four years of responsible power plant experience, of which a minimum of one year shall be nuclear power plant experience. A maximum of two years of the remaining three years of power plant experience may be fulfilled by academic or related technical training on a one-for-one basis.” Based on NRC approval of license amendment 258 for the Millstone Power Station Unit 2 and amendment 199 for the Millstone Power Station Unit 3, the following alternative to this requirement will be maintained in the consolidated QAPD for Millstone operating units: “Beginning November 1, 2001, applicants for senior reactor qualification shall meet or exceed the education and experience guidelines given in Revision 3 to Regulatory Guide 1.8”

ANSI N18.1-1971, subsection 4.5.1, states in part, “An operator (to be licensed by the AEC) shall have a minimum of a high school diploma or equivalent, and two years of power plant experience, of which a minimum of one year shall be nuclear power plant experience.” Based on NRC approval of license amendment 258 for the Millstone Power Station Unit 2 and amendment 199 for the Millstone Power Station Unit 3, the following alternative to this requirement will be maintained in the consolidated QAPD for Millstone operating units: “Beginning November 1, 2001, applicants for reactor qualification shall meet or exceed the education and experience guidelines given in Revision 3 to Regulatory Guide 1.8 (May 2000).”

ANS-3.1 (Draft 12/79), subsection 4.2.2 c. for the Operations Manager Training requires the individual filling this position to obtain and hold a senior operator license. Based on NRC guidance contained in Regulatory Guide 1.8, Revision 3, and a comparable alternative previously approved by the NRC through North Anna license amendments 142 for Unit 1 and 125 for Unit 2, and Surry license amendments 151 for Unit 1 and 148 for Unit 2, the following alternative will be applied for the North Anna and Surry operating units: “The individual filling the role of Operations Manager will meet the requirements of subsection 4.2.2, “Operations Manager” of ANSI/ANS-3.1-1993, subject to Regulatory Position C.2.5 of NRC Regulatory Guide 1.8, Revision 3. Since the Operations Middle Manager function is not discussed in ANSI/ANS-3.1 (Draft 12/79), the individual filling this role (e.g. Supervisor - Shift Operations) will meet the requirements for Operations Manager of ANSI/ANS-3.1 (Draft 12/79), including holding a Senior Operator’s License.”

ANS-3.1 (Draft12/79), Section 4.1 addresses those circumstances where individuals do not possess the formal educational requirements specified in the standard by indicating that other factors should be evaluated to ensure qualified individuals fill the organizational functions. As part of that evaluation, either of the following additional experience requirements may be considered equivalent to a Bachelor’s Degree: (1) Six years of applied engineering experience at a nuclear facility in the area for which qualification is sought. In addition,

experience and training requirements for the function shall be met as delineated. (2) Six years of operational or technical experience/training related to engineering in nuclear power. In addition, experience and training requirements for the function shall be met as delineated. These alternative experience requirements are acceptable since ANSI/ANS-3.1 (Draft 12/79) does not provide a clear alternative to the formal educational requirements, but does provide guidance. This guidance was utilized to develop the above alternate experience for personnel not holding a Bachelor's Degree in accordance with the education requirements of the standard.

ANSI/ANS-3.1 (Draft 12/79), subsection 4.4.5, Quality Assurance, identifies the requirements for professional or technical group leaders in the Quality Assurance function. Based on NRC guidance contained in Regulatory Guide 1.8, Rev. 3, the individuals filling this function within the company's Nuclear Oversight organization will comply with the following alternative: "ANSI/ANS-3.1-1993, subsections 4.3.7, Quality Assurance, and 4.4.13, Quality Assurance or Quality Control, subject to the description of the commitment to NRC Regulatory Guide 1.8, Revision 3."

ANSI/ANS-3.1 (Draft 12/79), subsection 4.3.2.b, describes the experience requirements for supervisors not requiring NRC license. The following alternate experience requirements may be applied to personnel filling the supervisory function: "At the time of appointment to the position; the supervisor shall have 4 years experience in the craft or discipline he supervises or an equivalent number of years nuclear plant experience in a supervisory position with a Senior Reactor Operator's license." This alternative is acceptable since individuals having the specified alternate experience possess a working knowledge of plant activities (e.g., operations, maintenance, I&C, health physics, etc.) sufficient to perform a broad range of supervisory functions. The individual's day-to-day interaction with the various plant activities has provided them with an understanding of how each activity is integrated into safe and effective plant operations. The combination of SRO training and plant experience is adequate to assure that actions performed by individuals under their supervision are both technically correct and consistent with approved programs and procedures.

ANSI/ANS-3.1 (Draft 12/79), subsection 5.3.3, describes the training requirements for the Shift Technical Advisor with Bachelor Degree without an NRC Senior Operator License. In lieu of the requirement of item 3) to that subsection, the following alternative may be applied: "The Shift Technical Advisors will observe control manipulations on the simulator as appropriate." This alternative is acceptable since the performing of control manipulations is not considered a Shift Technical Advisor task. The primary objective of Shift Technical Advisor simulator instruction is to demonstrate plant and operator response to given conditions or events, not to develop expertise in control manipulations.

ANSI/ANS-3.1 (Draft 12/79), Section 5.5 describes the retraining program requirements. The following alternative requirements will be applied for the following functional positions: "Requalification training requirements for Nuclear Shift Supervisor, Nuclear Assistant Shift Supervisor, Control Room Operator - Nuclear, and Shift Technical Advisor are addressed in the Technical Specifications of the individual nuclear facility." This alternative is acceptable

because these requalification training requirements have been reviewed and approved by the NRC as a part of the licenses.

Regulatory Guide 1.8, Rev. 3, Section C. Regulatory Position, paragraphs 2.1.1 and 2.1.3, address approval by the plant manager of the equivalents for education and experience for personnel filling Quality Assurance functional positions. The following alternative requirement for approval of the equivalents will be used by replacing the second sentence in each of the above paragraphs with the following sentence: “These other factors are to be evaluated on a case-by-case basis and approved and documented by the plant manager or the responsible executive.” This alternative is acceptable because the approval remains the responsibility of the plant manager or higher-level authority as appropriate to the reporting relationship of the Quality Assurance functions.

Regulatory Guide 1.8, Rev. 3, Section C. Regulatory Position, paragraphs 2.1.2, 2.3, 2.11, and 2.12 address endorsement of ANSI/ASME NQA-1-1983 related to qualification of Quality Control and Quality Assurance Personnel. Based on the (previously discussed) acceptance by the NRC for use of ANSI/ASME NQA-1-1994 at other nuclear power plants and as these Supplements and Appendices of ANSI/ASME NQA-1-1994 contain similar requirements to those in the endorsed standard, the following alternative standard will be used for the qualification of these personnel: “References to ANSI/ASME NQA-1-1983 and associated Supplements and Appendices are replaced with references to ANSI/ASME NQA-1-1994 and its associated Supplements and Appendices.”

The quality group classification systems used for the facilities conform with the requirements of Regulatory Guide 1.26 with the following alternative: “The company does not use the specific A, B, C, and D quality groups set forth in this guide. However, the company met the requirements of this guide in developing the list of SSCs and the corresponding association to quality standards. The specific items the QA program applies to are described in detail in the lists maintained by the Nuclear Engineering group.” This alternative is acceptable in that controls are established to ensure proper application of codes and standards to SSCs.

Regulatory Guide 1.28, Rev. 3, Part C, “Regulatory Position,” endorses the basic and supplementary requirements of ANSI/ASME NQA-1-1983 and the ANSI/ASME NQA-1a-1983 Addenda for the establishment and execution of quality assurance programs during the design and construction phases of nuclear power plants. As noted previously, based on the rationale contained in the NRC Safety Evaluation for approval of Quality Assurance Program Topical Report EGC-1A, Rev. 70, for the EXELON/AMERGEN Plants, dated December 24, 2002, the company commits to implement the requirements of the 1994 Edition. The company’s commitment to these requirements and any alternatives to the requirements are addressed in the QAPD.

Regulatory Guide 1.28, Rev. 3, Regulatory Position 3.2 establishes external auditing requirements that are acceptable to the NRC during the design and construction phases. The guidance provided regarding external audits will also be implemented during the operational phase. This alternative is acceptable in that it ensures appropriate controls for external audits are carried forward into the operational phase of the facilities.

The Introduction to Part I of NQA-1-1994, Section 4, and certain Subparts to Part II of NQA-1, define terms to be used with the quality assurance requirements. Additional definitions applicable to implementation of the Company's Quality Assurance Program are contained in Appendix D to the QAPD. This alternative ensures consistent understanding of the QAPD requirements at multiple facilities and is not considered to be a reduction in commitment based on 10 CFR 50.54(a)(3) allowing quality assurance program changes involving administrative improvements and clarifications, spelling corrections, punctuation, or editorial items.

NQA-1-1994, Supplement 2S-1, Supplementary Requirements for the Qualification of Inspection and Test Personnel will include use of the guidance provided in Appendix 2A-1, the same as if it were a part of the Supplement. The following two alternatives may be applied to the implementation of the requirements of this Supplement and Appendix. These alternatives are considered a reduction in commitment based on 10 CFR 50.54(a)(4), but are considered acceptable in that they provide for qualification by assessing the capabilities of the individual based on the function or tasks to be performed. Similar alternatives were previously submitted to the NRC from Virginia Electric and Power Company, Dated February 27, 2003, Serial No. 02-735, Docket Nos. 50-280, 50-281, 50-338, 50-339, and 72-2, 72-16. That submittal had not been approved at the time of this writing.

(1) The company may choose to not specifically use the designations of Level I, II, and III for qualification of inspectors. However, the qualification program will ensure that only personnel that meet the required education and experience requirements, and have demonstrated appropriate capabilities in the inspection activities they are assigned will be certified and used to perform those inspections. The inspectors used in planning inspections will meet or exceed the education and experience requirements of for a Level II inspector plus have an additional three years of related inspection experience for nuclear facilities. The inspectors used to evaluate the capabilities of other inspectors will meet or exceed the education and experience requirements for a Level II inspector plus have an additional five years of related experience in inspection, examination, or testing activities for nuclear facilities. This related experience may include ASME VT 1, 2, or 3 examinations, NDE, or ASME Section XI inservice inspection or testing activities. A qualified engineer may also be used to evaluate the capabilities of an inspector. The training program for inspectors will be evaluated and approved by personnel who meet the education, experience, and capabilities designated for a Level III person specific to the discipline or a qualified engineer. For the purposes of this alternative, a qualified engineer is one who has a baccalaureate in engineering in a discipline related to the inspection activity (such as, electrical, mechanical, civil) and has a minimum of five years engineering work experience with at least two years of this experience related to nuclear facilities.

(2) As an alternative to the education requirement of high school graduation (or GED), satisfactory demonstration of reading, writing, and mathematical skills through completion of an NANT accredited training development program or an approved inspector training program for nuclear facility personnel will be deemed equivalent.

NQA-1-1994, Supplement 2S-2, Supplementary Requirements for the Qualification of Nondestructive Examination Personnel, subsection 2.1, requires application of Recommended Practice SNT-TC-1A, June 1980 Edition to NDE personnel. The company will implement the qualification program required by this supplement in accordance with the applicable standard for the facility's commitment to the ASME code or other applicable code governing the activity. This alternative is considered acceptable because other editions of this recommended practice or other national standards may be required by industry codes or regulations for qualification of NDE personnel.

NQA-1-1994, Supplement 7S-1, Supplementary Requirements for Control of Purchased Items and Services, Section 10 addresses requirements for Commercial Grade Items. Based on NRC Generic Letter 89-02 and its endorsement of EPRI NP-5652, Guideline for the Utilization of Commercial-Grade Items in Nuclear Safety-Related Applications (NCIG-07), the Company will use the guidance contained in EPRI NP-5652 instead of these requirements.

NQA-1-1994, Supplement 10S-1, Supplementary Requirements for Inspection, subsection 3.1 addresses reporting independence and requires that inspection personnel shall not report directly to the immediate supervisors who are responsible for performing the work being inspected. During operational phase activities where inspections are performed by line personnel, the inspectors functionally report to the appropriate management position responsible for nuclear station safety & licensing or for assuring supplier quality while performing the inspection activity. This alternative is acceptable based on the requirements described in ANSI N18.7-1976/ANS-3.2, subsection 5.2.17, second paragraph, which allows independent inspections to be performed by qualified personnel (second line supervisors, or other qualified personnel) other than the individuals assigned first-line supervisory responsibility for the work. The ANSI N18.7-1976 requirements were applicable to the operating facilities under the previous operational phase quality assurance programs.

NQA-1-1994, Subpart 2.2, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, requirements will be incorporated into the company program subject to the following alternatives:

(1) For items in storage, the packaging requirements described under Section 3, "Packaging," may include alternate methods of affording the required protection such as maintaining a storage atmosphere free from harmful contaminants in concentrations that could produce damage to the stored items, or utilizing storage practices that obviate the need for capping all openings as determined by facility management. This alternative is acceptable based on providing an equivalent level of protection for the items in storage.

(2) For items in storage at company facilities, the items and the outside of containers (when present) need to meet the appropriate criteria of subsection 3.9, "Marking," necessary to ensure the identity of the item, and proper instructions for preservation during storage and future handling are retained. This alternative is acceptable since information related to shipping, such as destination and return addresses, and number of units shipped, are not required on the item or its associated container during storage periods.

(3) Regarding maintenance of items in storage in accordance with subsection 6.4.2, “Care of Items,” the requirement of item (f) will not apply to rotating electrical equipment less than 50 HP, the requirement of item (g) will not apply to rotating equipment weighing less than 50 pounds, the requirements of (e), (f), and (g) may be exempted for specific items on a case-by-case basis provided that a documented engineering evaluation determines that such care is not required. This alternative is acceptable based on requirements contained in the previous operational QA program for North Anna and Surry that reflected company practices in establishing specific and practical limits on the care of items in storage gathered during more than ten years of experience in operational activities for nuclear facilities.

(4) Subsection 6.6, “Storage Records,” requires written records be prepared containing information on personnel access. As an alternative to this requirement, company documents establish controls for storage areas that describe those authorized to access areas and the requirements for recording access of personnel. However, these records of access are not considered quality records and will be retained in accordance with the administrative controls for the facility. This alternative is acceptable based on the description of records contained in Section 8, “Records,” of Subpart 2.2, as well as the programmatic description of records contained within Part I of NQA-1.

NQA-1-1994, Subpart 2.3, Quality Assurance Requirements for Housekeeping for Nuclear Power Plants, will be implemented with the following alternative that will be applied during the operational phase: The Company may choose to not utilize the five-level zone designations, but will utilize work practices, as described in administrative controls, that provide an equivalent level of cleanliness control required by the subpart. This will include as a minimum documented cleanliness inspections, which will be performed prior to system closure. As necessary, (e.g., the size of the opening would permit entry of the tools being used) control of personnel, tools, equipment, and supplies will be established when major portions of the reactor system are opened for inspection, maintenance, or repair. This alternative is acceptable based on providing an equivalent level of control over housekeeping activities.

NQA-1-1994, Subpart 2.4, Installation, Inspection, and Testing Requirements for Power, Instrumentation, and Control Equipment at Nuclear Facilities (ANSI/IEEE Std. 336-1985), will be implemented with the following alternatives:

(1) All references to ANSI/ASME NQA-1, ANSI/ASME NQA-2, and ANSI/ANS-3.2 are changed to refer to the appropriate sections of ANSI/ASME NQA-1-1994 and this QAPD. This alternative is acceptable because it provides consistency with the QAPD used to implement the company’s commitment to 10 CFR 50, Appendix B.

(2) With regard to subsection 3.3, “Procedures and Instructions,” as an alternative to the requirement to utilize a checklist and mark as required or not appropriate the listed items during preparation of procedures or instructions, the Company utilizes administrative controls to ensure the appropriateness and correctness of procedures and instructions including reviews against standards that may not require a checklist to be marked. This alternative is acceptable because it allows for a consistent method of preparing procedures and instructions in accordance with company administrative controls.

(3) Instrumentation and control devices installed in operating facilities are not required to be labeled as described in subsection 7.2.1, provided the information is maintained in suitable documentation traceable to the device. This alternative is acceptable based on providing an equivalent level of control over information related to the calibration of these devices.

NQA-1-1994, Subpart 2.5, Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete, Structural Steel, Soils, and Foundations for Nuclear Power Plants, will be implemented with the following alternatives:

(1) Where important to safety structures other than concrete reactor vessels and containments are constructed or modified, other appropriate industry codes and standards may be invoked in place of ACI 359 as specified by the responsible design organization so long as they meet any current license commitments. This alternative is acceptable in that it provides for the use of appropriate standards based on the importance to safety of the structure within the QA requirements for the design control program.

(2) With regard to subsection 7.7, "Curing," ASTM C 1315 is added to the first paragraph as another applicable standard for test methods for curing compounds. This alternative is acceptable based on a later approved standard that is comparable for meeting the requirements of subsection 7.7.

NQA-1-1994, Subpart 2.15, Quality Assurance Requirements for Hoisting, Rigging, and Transporting of Items for Nuclear Power Plants, will be implemented with the alternative that the Company may choose to not use the specific classification of Categories A, B, and C, but ensures items to be handled are evaluated and the appropriate range of controls and requirements for the activity are applied consistent with this Subpart. This alternative is acceptable based on providing an equivalent level of control based on the specific handling operation to be performed.

NQA-1-1994, Subpart 2.16, Requirements for the Calibration and Control of Measuring and Test Equipment Used in Nuclear Facilities (ANSI/IEEE Std. 498-1985) will be implemented with the following alternatives:

(1) All references to ANSI/ASME NQA-1, ANSI/ASME NQA-2, and ANSI/ANS-3.2 are changed to refer to the appropriate sections of ANSI/ASME NQA-1-1994 and this QAPD. This alternative is acceptable because it provides consistency with the QAPD used to implement the company's commitment to 10 CFR 50, Appendix B.

(2) Instrumentation and control devices installed in operating facilities are not required to be labeled as described in Subpart 2.16, subsection 5.5, provided the information is maintained in suitable documentation traceable to the device. This alternative is acceptable based on providing an equivalent level of control over information related to the calibration of these devices.

NQA-1-1994, Subpart 2.18, Quality Assurance Requirements for Maintenance of Nuclear Facilities, will be implemented with the following alternatives:

(1) Where this subpart references the requirements of ANS-3.2, it shall be interpreted to mean the applicable standards and requirements established within this QAPD. This alternative is acceptable because it provides consistency with the approved Quality Assurance Program Description used to implement the company's commitment to 10 CFR 50, Appendix B.

(2) Regarding subsection 2.5, "Work Authorization," paragraph (d), the requirement that the description of work reference the applicable maintenance procedures will be treated as guidance. This alternative is acceptable because the supervisor and lead technician performing the work are responsible to ensure that they are using the appropriate maintenance procedure.

Regulatory Guide 1.33, Revision 2, February 1978, Quality Assurance Program Requirements (Operation), endorses ANSI N18.7-1976/ANS-3.2 as providing overall acceptable quality assurance program requirements for the operations phase of nuclear power facilities. The Company commits to implementing administrative controls and quality assurance measures during the operations phase for its facilities that are equivalent in nature to those contained in the endorsed standard subject to the following alternatives:

(1) The operational phase quality assurance program requirements will be established through the Company's commitment to ANSI/ASME NQA-1-1994 as described within this QAPD. This edition of NQA-1 contains overall quality assurance requirements equivalent to those of ANSI N18.7-1976, and the Company has included within this QAPD the required administrative controls from ANSI N18.7-1976. Therefore, the Company does not commit to compliance with the requirements of ANSI N18.7-1976/ANS-3.2.

(2) As recommended by Regulatory Position C.1, the Company uses Appendix A of Regulatory Guide 1.33 as guidance in establishing the types of procedures required for plant operation and support.

(3) The Company's commitment to the applicable Regulatory Guides and associated standards listed in Regulatory Position C.2 is addressed within this QAPD. A number of these Regulatory Positions and Standards have been incorporated into NQA-1.

(4) The Company complies with Regulatory Position C.3, as described in Appendix B of this QAPD. Appendix B of this QAPD describes the Company's independent review programs.

(5) The Company complies with Regulatory Position C.4 as described within Section 18 of this QAPD, subject to the following alternatives that are comparable to those approved under the previous operational quality assurance programs:

(1) The results of actions taken to correct deficiencies affecting nuclear safety that occur in the facility SSCs or methods of operation are evaluated as a part of each audit

performed as related to that audited area. An audit of the effectiveness of the corrective action program is performed at a frequency not to exceed two years.

(2) Audits of conformance of facility operation to provisions of the Technical Specifications and applicable license conditions are performed at a frequency not to exceed two years.

(3) Audits of the performance, training, and qualifications of the facility staff are performed at a frequency not to exceed two years.

(6) In lieu of compliance with Regulatory Position C.5, the Company has established appropriate equivalent requirements within this QAPD.

Regulatory Guide 1.152, Revision 1, January 1996, Criteria for Digital Computers in Safety Systems of Nuclear Power Plants, endorses IEEE/ANS-7-4.3.2-1993. The Company commits to using the guidance of this Standard within the provisions of the Regulatory Guide with the alternative that where this Standard makes reference to ASME NQA-1 and ASME NQA-2, the reference will be interpreted to mean the applicable requirements of NQA-1-1994 and this QAPD. This alternative is acceptable because it provides consistency with the approved Quality Assurance Program Description used to implement the company's commitment to 10 CFR 50, Appendix B.

Quality Commitments not Addressed in the Previous Topical Reports

Regulatory Guide 1.36, Revision 0, February 1973, Nonmetallic Thermal Insulation for Austenitic Stainless Steel. None of the current Company nuclear facilities were committed to this Regulatory Guide during original construction. The Company does not commit to this Regulatory Guide for its existing plants but will use this guidance for the construction of any new nuclear power plants. This Regulatory Guide may be used for plant modifications on a case-by-case basis.

Regulatory Guide 1.54, Revision 0, June 1973, Quality Assurance for Protective Coatings Applied to Nuclear Power Plants, endorses ANSI N101.4-1972. The commitment to this Regulatory Guide during construction and earlier operations was site specific as listed in the approved SAR or License for each Company nuclear facility. The Company commits to the QA requirements of this Regulatory Guide and Standard for design and construction activities. Applicability and implementation of this guide, including quality inspection requirements, for modifications will be determined as needed, by a qualified engineer.

Regulatory Guide 1.143, Revision 2, November 2001, Design Guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-water-cooled Nuclear Power Plants. The commitment to this Regulatory Guide (including specific revision) during construction and earlier operations was site specific as listed in the approved SAR or License for each Company nuclear facility. The Company commits to this Regulatory Guide for the construction of any new nuclear power plants. The applicable requirements of this Regulatory Guide will be used for plant modifications on a case-by-case basis.

Regulatory Guide 4.15, Revision 1, February 1979, Quality Assurance for Radiological Monitoring Programs (Normal Operations), The Company programs for radiological environmental monitoring comply with the QA requirements of this Regulatory Guide.

Regulatory Guide 7.10, Revision 1, June 1986, Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material, The Company programs for issuing radioactive material for transport complies with the QA requirements for procurement, use, and maintenance of packaging used in the transport of radioactive material as describe in this Regulatory Guide.

Generic Letter 89-02 endorses EPRI-NP-5652, Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products. The Company commits to use of the endorsed industry guidance regarding the selection and qualification of commercial grade Suppliers and for the dedication of commercial grade items used in applications that are important to safety.

Branch Technical Position ASB/CMEB 9.5-1, Guidelines for Fire Protection for Nuclear Power Plants. The Company commits to implementing the guidance of this Technical Position, however, application of the requirements is site specific as described in the applicable facility SAR and license documents. The Company QA program complies with the QA requirements described in Position C.4.

Summary of Changes by Section

The following table provides a brief synopsis of changes by section of the two current Topical Reports.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
General (Entire Program)	The Quality Assurance Program now applies to all phases of the nuclear facilities (power plants and ISFSIs) including construction, operations, and decommissioning. Where applicable, additional information is included for initial start-up and design/construction issues to address potential new facilities. The entire program is being submitted as a reduction in commitment in totality to address the applicability to all nuclear facilities and stages.	The Quality Assurance Program now applies to all phases of the nuclear facilities (power plants and ISFSIs) including construction, operations, and decommissioning. Where applicable, additional information is included for initial start-up and design/construction issues to address potential new facilities. The entire program is being submitted as a reduction in commitment in totality to address the applicability to all nuclear facilities and stages
General (Entire Program)	The QA requirements and Administrative Controls of ANSI N18.7 that are not a part of NQA-1 have been incorporated into the QAPD. This eliminates redundancy and possible conflicts between the standards and incorporates the changes to N18.7 requirements that have been approved by the NRC over the years.	The QA requirements and Administrative Controls of ANSI N18.7 that are not a part of NQA-1 have been incorporated into the QAPD. This eliminates redundancy and possible conflicts between the standards and incorporates the changes to N18.7 requirements that have been approved by the NRC over the years.
General (Entire Program)		Note – the Quality Assurance Program Description was Chapter 17 of the FSAR (North Anna Power Station – NAPS UFSAR Chapter 17, Rev. 39 and Surry Power Station - SPS UFSAR Chapter 17, Revision 35) and is now a standalone Topical Report (referenced in Chapter 17 of the FSAR).
General (Entire Program)	Information previously covered in the QA Program Topical Report that is contained in the standards is not repeated unless needed for clarity. Details more appropriately covered in implementing procedures are also no longer contained in the QA Program Description. For example, “Materials, Equipment and Parts List (MEPL)” program is no longer specifically discussed in the QAPD, but may be discussed in implementing procedures.	Information previously covered in the QA Program (FSAR Chapter 17) that is contained in the standards is not repeated unless needed for clarity. Details more appropriately covered in implementing procedures are also no longer contained in the QA Program Description. For example, “Station Q-List” is no longer specifically discussed in the QAPD, but may be discussed in implementing procedures.
General (Entire Program)	Generic titles and functional groups are used where appropriate throughout the QAPD, consistent with 10 CFR 50.54(a)(3)(iii).	Generic titles and functional groups are used where appropriate throughout the QAPD, consistent with 10 CFR 50.54(a)(3)(iii).
General (Entire Program)	Each section in the consolidated QAPD contains a “Quality Standard Reference” which describes applicable commitments to related NQA-1 sections.	Each section in the consolidated QAPD contains a “Quality Standard Reference” which describes applicable commitments to related NQA-1 sections.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
Table of Contents	Modified to TOC for current document.	Modified to TOC for current document.
Abstract	Eliminated – Redundant to Policy and Introduction.	Eliminated – Redundant to Policy and Introduction.
Basis	Added to the QAPD.	Added to the QAPD.
Policy Statement	Abbreviated to global statement ensuring safety and quality.	Briefly covered under Section 17.2.0, now in separate policy statement.
Introduction	Abbreviated to global introduction, which refers to appropriate regulations and industry standards to ensure safety and quality.	Briefly covered under Section 17.2.0, now in separate policy statement.
QAPD 1.0	Eliminated reference to Chief Executive Officer and President/Chief Operating Officer. Chief Nuclear Officer (CNO) actually has responsibility for Dominion nuclear plants.	N/A – North Anna/Surry previous organization only included from Chief Nuclear Officer (CNO) down.
QAPD 1.0	Reporting relationships were eliminated from the text, as they are described by the organizational charts in Appendix A.	Reporting relationships were eliminated from the text, as they are described by the organizational charts in Appendix A.
QAPD 1.0	N/A – cross-reference list was in Appendix G – also eliminated. This level of detail to be included in Company implementing documents.	Eliminated cross reference (to Technical Specification title) list in Section 17.2.1.1.A due to change to generic titles (pending TS change approval). This level of detail to be included in Company implementing documents.
QAPD 1.0	Organization description made by functions with generic titles for responsible individuals, consistent with current 50.54(a)(3).	Organization description made by functions with generic titles for responsible individuals, consistent with current 50.54(a)(3).
QAPD 1.0	Eliminated specific responsibilities of positions (e.g., licensed and non-licensed operators) that are defined in implementing procedures. (Not required per NQA-1 or related regulatory guides.)	N/A
QAPD 1.0	Section 1.4, “Quality-related responsibilities common to all Department Heads” was related as redundant to language in regulations, standards, and other portions of the QAPD.	N/A, previously not defined in separate section, but implemented through administrative controls.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
QAPD 1.0	Section 1.5, “Management Quality Review” is revised for MPS and implemented through QAPD Section 2.3 and Appendix B and company implementing procedures.	N/A, previously not defined in separate section, but implemented through QAP and related administrative controls.
QAPD 1.0	Section 1.7, “Succession of Responsibility for Overall Plant Operations” was replaced with Section 1.3, “Succession of Responsibility for Overall Plant Operations” and supplies less detail (fewer levels of management) as additional succession of responsibility guidance are defined in company administrative controls and may use the option of designating in writing who is standing in for an absent person.	Succession of Responsibility was previously addressed for the position of Site Vice President in the current Topical Report 17.2.1.2.B.1, paragraph 2.
QAPD 1.0	“Nuclear Procedures & Document Administration” is not described as a functional group, but their roles and responsibilities are defined and described under “Nuclear Procedures” and “Nuclear Records.” Although the reporting relationships differ at Millstone than at North Anna/Surry, the functional roles and responsibilities continue to be met and ensure quality. This also allows for reorganization of the group if determined by management to be feasible.	Not applicable. North Anna/Surry has separate groups for Nuclear Records and Nuclear Procedures. Their current organization is as described in the QAPD.
QAPD 1.0	Stop Work was in Section 1.0 but now includes nuclear oversight and others performing quality (inspection) activities to address changes in Section 10.0 based on North Anna/Surry program. (Additional details will be in implementing procedures.)	“Stop Work Details” are now contained in this section, as well as other QAPD sections and implementing procedures.
QAPD 1.0	N/A, MSRC description was in Appendix F of the Millstone QAP.	Description of the Management Safety Review Committee (MSRC) was moved to QAPD, Appendix B.
QAPD 1.0	Organization charts were relocated to Appendix A.	Organization charts now in Appendix A, but were previously contained in Figure 17.1.1, 17.1.2, and 17.1.3.
QAPD 2.0 General NOTE	Qualification requirements previously contained throughout the QAP and/or in station Technical Specifications are contained in QAPD 2.0, Section 2.5.	Qualification requirements previously contained throughout the QAP and/or in station Technical Specifications are contained in QAPD 2.0, Section 2.5.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
QAPD 2.0	Applicability of the program was included under Section 2.1 General Requirements and is now included under Section 2.2.	Applicability of the program was included under Section 17.2.2.1 General Requirements and is now included under Section 2.2.
QAPD 2.0	Structures, Systems and Components were described in Section 2.2.3 and are now discussed in Section 2.4 with less detailed, but similar, content (both refer to the applicable facility's Safety Analysis Report).	Structures, Systems and Components were described in Section 17.2.2.3 and are now discussed in Section 2.4 with less-detailed, but similar, content (both refer to the applicable facility's Safety Analysis Report).
QAPD 3.0	Design Control details are described only above those stated in NQA-1 or other QAPD sections.	Design Control details are described only above those stated in NQA-1 or other QAPD sections.
QAPD 3.0	The "design control program" is addressed generically, not as a specific program. The specifics are addressed in implementing procedures.	The "design control program" is addressed generically, not as a specific program. The specifics are addressed in implementing procedures.
QAPD 3.0	Departmental (including Engineering) responsibilities are discussed in QAPD Section 1.0, and not repeated throughout the QAPD.	N/A
QAPD 3.0		The Q-List is no longer mentioned by name, but the requirement to have a Q-List remains with the details of the program contained in implementing procedures. The requirements have been relocated to Section 2, appropriate to where this is addressed under 10 CFR 50, Appendix B.
QAPD 4.0	Procurement Document Control details are described only above those stated in NQA-1 or other QAPD sections. Implementation details are further described in administrative controls.	Procurement Document Control details are described only above those stated in NQA-1 or other QAPD sections. Implementation details are further described in administrative controls.
QAPD 5.0	Similar to the Millstone QAP, with the exception that information contained in NQA-1-1994 is not repeated in the consolidated QAPD. Commitments from N18.7 regarding procedures are specified in this section and meet the intent of N18.7.	Similar to the North Anna/Surry QATR, with the exception that information contained in NQA-1-1994 is not repeated in the consolidated QAPD. Commitments from N18.7 regarding procedures are specified in this section and meet the intent of N18.7.
QAPD 5.0	Requirements from Section 5 that are more appropriate to document control measures have been relocated to Section 6.	Requirements from Section 5 that are more appropriate to document control measures have been relocated to Section 6.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
QAPD 6.0	Similar to the Millstone QAP, with the exception that information contained in NQA-1-1994 is not repeated in the consolidated QAPD and commitments from N18.7 regarding procedure control is specified in this section and meets the intent of N18.7.	Similar to the North Anna/Surry QAPD, with the exception that information contained in NQA-1-1994 is not repeated in the consolidated QAPD and commitments from N18.7 regarding procedure control is specified in this section and meets the intent of N18.7.
QAPD 7.0	Control of Purchased Material, Equipment and Services details are described only above those stated in NQA-1 or other QAPD sections.	Control of Purchased Material, Equipment and Services only above those stated in NQA-1 or other QAPD sections.
QAPD 8.0	Identification and Control of Materials, Parts and Components details are described only above those stated in NQA-1 or other QAPD sections.	Identification and Control of Materials, Parts and Components details are described only above those stated in NQA-1 or other QAPD sections.
QAPD 9.0	Control of Special Processes details are described only above those stated in NQA-1 or other QAPD sections.	Control of Special Processes details are described only above those stated in NQA-1 or other QAPD sections.
QAPD 10.0	Inspection details are described only above those stated in NQA-1 or other QAPD sections.	Inspection details are described only above those stated in NQA-1 or other QAPD sections.
QAPD 10.0	Responsibilities for inspection are relocated to Section 1, while the program requirements are addressed in this section. Specific reference to Nuclear Oversight personnel has been eliminated from the QAPD to allow other company facilities to follow their inspection process. Additional description of the Millstone Inspection process is contained in implementing procedures.	Responsibilities for inspection are relocated to Section 1, while the program requirements are addressed in this section. Specific references to inspection personnel that may preclude other facility's inspection processes have been eliminated from the QAPD to allow those facilities to follow their inspection process. Additional description of the North Anna/Surry Inspection process is contained in implementing procedures.
QAPD 11.0	Test Control details are described only above those stated in NQA-1 or other QAPD sections.	Test Control details are described only above those stated in NQA-1 or other QAPD sections.
QAPD 11.0	Additional information is included for initial start-up and construction issues to address potential new facilities.	Additional information is included for initial start-up and construction issues to address potential new facilities.
QAPD 12.0	Control of Measuring and Test Equipment details is described only above those stated in NQA-1 or other QAPD sections. Similar content from existing QAP.	Control of Measuring and Test Equipment details is described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
QAPD 13.0	Handling, Storage, and Shipping details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.	Handling, Storage, and Shipping details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.
QAPD 14.0	Inspection, Test, and Operating Status details are described only above those stated in NQA-1 or other QAPD sections. The Administrative Controls from N18.7 regarding control of operating equipment are included in this section.	Inspection, Test, and Operating Status details are described only above those stated in NQA-1 or other QAPD sections. The Administrative Controls from N18.7 regarding control of operating equipment are included in this section.
QAPD 15.0	Nonconforming Materials, Parts or Components details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.	Nonconforming Materials, Parts or Components details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.
QAPD 16.0	Corrective Action details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program, but allows other processes to be used based on implementing procedures.	Corrective Action details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program, but allows other processes to be used based on implementing procedures.
QAPD 16.0	N/A	The Potential Problem Reporting System (PPR) will be addressed in implementing procedures as a part of design control/engineering processes.
QAPD 16.0	N/A – already had “Stop Work” in Section 1.0. (Additional details will be in implementing procedures.)	“Stop Work” details have been moved to Section 1 and implementing procedures.
QAPD 17.0	Quality Assurance Records details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.	Quality Assurance Records details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.
QAPD 18.0	Quality Assurance Audits details are described only above those stated in NQA-1 or other QAPD sections. The Administrative Controls from N18.7 regarding audits are included in this section. Additional information has been added to discuss audits of facilities under construction.	Quality Assurance Audits details are described only above those stated in NQA-1 or other QAPD sections. The Administrative Controls from N18.7 regarding audits are included in this section. Additional information has been added to discuss audits of facilities under construction.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
Appendix A	Appendix A now contains Organizational Charts previously contained in Section 1.0. Organizational charts are functionally oriented, not based on location.	Organizational charts were contained in Appendix A figures, but were offsite/onsite rather than functionally oriented.
Appendix A	Eliminated reference to CEO and President /COO in Organizational Charts. CNO actually has responsibility for Dominion nuclear plants.	
Appendix A	Appendix A was previously the Unit 2/3 Category I structures, systems and components, and included description of the Materials, Equipment and Parts List (MEPL) program. The MEPL program is now described in implementing procedures.	Appendix A of the North Anna/Surry Topical Report consisted of the Organization charts.
Appendix B	Millstone's previous Appendix B contained information available in ANSI N18.1 and/or RG 1.8. Per current 10 CFR 50.54(a) requirements, this information is not repeated in the consolidated QAPD.	
Appendix B		North Anna/Surry Appendix B consisted of a List of Tables: 17.2-0 "Conformance of the Company's Operational Quality Assurance Program to NRC Regulatory Guides and ANSI Standards," is now in Appendix C and/or in quality standard reference section of the QAPD. 17.2-1 "Relationship of the Company's Operational Quality Assurance Program to Appendix B, 10 CFR 50," was eliminated from QAPD and is discussed in the Introduction. 17.2-2 "Station Records Retention List," moved to Appendix E.
Appendix B	For Millstone, Independent Reviews/Administrative Controls were previously described in Appendix F.	
Appendix B	Independent Safety Engineering Group (ISEG) functions previously transferred to SNS and minimum reduced to four members-Submitted in Revision 25 (Based on NRC SER to Perry Nuclear, dated September 16, 1998, TAC MA3325.)	Station Nuclear Safety (previously described for North Anna in Appendix C and Tech. Spec. Admin. Controls for Surry) was modified to a minimum of 4 members, rather than five. (Based on NRC SER to Perry Nuclear, dated September 16, 1998, TAC MA3325.)

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
Appendix C		For North Anna, Dominion Appendix C previously described the offsite review committee (Management Safety Review Committee - MSRC), the onsite review committee (Station Nuclear Safety and Operating Committee – SNSOC) and the Station Nuclear Safety (SNS) group. This is now described in Appendix B.
Appendix C	Millstone Appendix C contained Millstone specific commitments. Appendix C now contains both Dominion commitments and clarifications as applicable. In addition, each individual section defines a quality standard reference.	North Anna/Surry Appendix B, Table 17.2-0 contained commitments with specific clarifications and exceptions. Appendix C now contains both Dominion commitments and clarifications as applicable. In addition, each individual section defines a quality standard reference.
Appendix C	Dominion consolidated QAPD does not commit to Regulatory Guides (RG) withdrawn in NRC correspondence dated June 17, 1991, which withdrew the following when the licensee(s) QAPD commits to NQA-1: <ul style="list-style-type: none"> • Regulatory Guide 1.58 • Regulatory Guide 1.64 • Regulatory Guide 1.88 • Regulatory Guide 1.123 • Regulatory Guide 1.144 • Regulatory Guide 1.146 	Dominion consolidated QAPD does not commit to Regulatory Guides (RG) withdrawn in NRC correspondence dated June 17, 1991, which withdrew the following when the licensee(s) QAPD commits to NQA-1: <ul style="list-style-type: none"> • Regulatory Guide 1.58 • Regulatory Guide 1.64 • Regulatory Guide 1.88 • Regulatory Guide 1.123 • Regulatory Guide 1.144 • Regulatory Guide 1.146
Appendix C	ANSI N45.2.8 was replaced by NQA-1-1994 Subpart 2.8, which incorporates the appropriate guidance of the Regulatory Positions of Reg. Guide 1.116.	ANSI N45.2.8 was replaced by NQA-1-1994 Subpart 2.8, which incorporates the appropriate guidance of the Regulatory Positions of Reg. Guide 1.116.
Appendix D	Millstone Appendix D contained Millstone specific definitions. NQA-1 contains some definitions, and Appendix D contains additional Dominion definitions necessary to ensure clarity of the QAPD. Included definitions previously in ANSI N18.7 that are not covered by NQA-1.	North Anna/Surry modified their commitment to ANSI N45.2.10 to NQA-1 with additional Dominion definitions. Appendix D contains additional Dominion definitions necessary to ensure clarity of the QAPD. Included definitions previously in ANSI N18.7 that are not covered by NQA-1.

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
Appendix E	QAPD Appendix E contains “Additional QA Records Requirements for Operating Facilities” previously contained in Appendix F.	QAPD Appendix E contains “Additional QA Records Requirements for Operating Facilities” previously located in Table 17.2-2.
Appendix E	Millstone Appendix E contained Millstone specific exceptions. Exceptions are now contained in related sections and/or in Appendix C, which now contains both Dominion commitments and clarifications.	N/A – North Anna/Surry had no Appendix E – clarifications/exceptions were contained in Appendix B, Table 17.2-0.
Appendix F	Information now contained in Appendix B or has been placed in related sections and/or implementing procedures – e.g. The Station Qualified Reviewer process is described in implementing procedures.	N/A– North Anna/Surry had no Appendix F and no Station Qualified Review process described in their QA program. The details of the review process for procedures and programs was addressed in implementing procedures.
Appendix F	Station Records Retention List now in Appendix E.	N/A – North Anna/Surry had no Appendix F and records requirements were contained in Table 17.2-2.
Appendix F	SORC membership requirements, quorum and review responsibilities have been modified and are described in Appendix B under the functional description of facility safety review committee. The change reflects the minimum review requirements of ANSI N18.7-1976. This will allow reducing the number of members from the current 11 members to a minimum of 5, with corresponding changes in the quorum and use of alternates.	N/A - North Anna/Surry did not have an Appendix F. The requirements for SNSOC were described in the current QATR, Appendix C for North Anna and the administrative controls section of the Technical Specifications for Surry. SNSOC is now described in Appendix B of the new QAPD, under the functional description of facility safety review committee and currently have minimum requirements as described therein.
Appendix F	The current SORC members require an academic degree in an engineering or physical science field, and have a minimum of five years technical experience in their respective field of expertise; or hold a management position, and have a minimum of five years technical experience in their respective field. The facility safety review committee will meet the qualification requirements of ANS-3.1-1993, subsection 4.7, as clarified in NRC Regulatory Guide 1.8, Revision 3, and the QAPD.	

Synopsis of Changes by Section		
<u>Section</u>	<u>Millstone</u>	<u>North Anna/Surry</u>
Appendix F	“Safety Limit Violation” was eliminated from the QAPD. The regulatory requirements are covered in 10 CFR 50.36 and 10 CFR 50.72. Internal reporting requirements are covered in implementing procedures.	N/A – North Anna/Surry had no reference to Safety Limit Violation in the QA program. Internal reporting requirements are covered in implementing procedures.
Appendix G	Millstone Appendix G, a cross-reference (to Technical Specification title) list was eliminated due to change to generic titles. This level of detail will be contained in implementing documents. (Pending approval of the TS changes.)	N/A– Cross-reference list was in Section 17.2.1.1.A – also eliminated. This level of detail will be contained in implementing documents. (Pending approval of the TS changes.)