71-0250

E-21722
November 9, 2004

ATTENTION: Document Control Desk
Mr. E. William Brach
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
11555 Rockville Pike
Rockville, MD 20852

Subject: Proposed Revision 3 to the Transnuclear QA Program Description Manual

Dear Mr. Brach:

We are hereby submitting a routine update to our Quality Assurance Program Description Manual (QAPDM) to reflect organizational and title changes, minor adjustments in some programmatic activities, and editorial changes to clarify some statements of requirement.

Please note that Revision 2 of the Transnuclear QAPDM was previously approved under Docket No. 71-0250 for use in accordance with the requirements of 10 CFR 71 and 10 CFR 72.

In order to support your review, we have attached the following documents for your use:

- An **Information-Only** copy of the current Revision 2 of the Transnuclear QAPDM.

- A **Marked-Up** copy of the current Revision 2 of the Transnuclear QAPDM showing proposed revisions. All formatting has been removed and paragraph numbering has been inserted, however the content and page numbering of Revision 2 have been retained. Inserted text is shown with a double underline and all deleted text has been shown with a single strike-out.

- A detailed **Explanation of Proposed Changes** describing every change being proposed. This explanation references the page and paragraph from Revision 2 that is being changed; a detailed description of all changes; a categorization of the change as being Editorial in nature, thereby having no effect on any existing statement of requirement, or a Change in a statement of requirement that needs to be considered as a possible reduction in commitment, as well as Transnuclear's assessment of all such changes.

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- An **Approved** copy of the proposed Revision 3 to the Transnuclear QAPDM with all proposed changes incorporated. Due to the extensive number of changes, this revision is considered to be a complete rewrite; therefore, no revision bars have been applied. Although this QAPDM is dated November 9, 2004, Transnuclear understands that implementation cannot occur until NRC acceptance is received.

Based on our assessment, the proposed changes fall into four general **Categories**:

1. Changes in the formatting of the document, cleanup and correction of grammar, revised sentence construction and style, and use of other word choices to better express the same requirements.
2. Updates in company addresses, minor organizational changes, updating of position titles, and updates in terminology such as the Transnuclear Implementing Procedures (TIPs) replacing Quality Assurance Procedures (QAPs), etc.
3. Changes in TN personnel assignments of responsibility for certain tasks requiring evaluation for possible reductions in commitment.
4. Changes in statements of requirement requiring evaluation for possible reductions in commitment.

The proposed changes described in **Category 1** and **Category 2** have been evaluated as not having any impact on existing regulatory commitments. These account for 176 out of the 187 proposed changes. The changes in the last two categories were evaluated for possible reductions in commitment with the following results.

Category 3 - Changes in TN personnel designated in QAPD Revision 2 for certain tasks requiring evaluation for possible reductions in commitment. These generally fell into two sub-categories:

1. Changes in corporate QA responsibilities assigned to the Director, Corporate Quality Assurance instead of a Quality Assurance Manager at each company location. In each case, a broader, more comprehensive, and more integrated function will result. **(Changes 47, 61, 161, 181, 182)**

2. Changes in certain activities assigned solely to QA personnel or the QA department. In these cases, others in the line organizations can and should be involved in these activities as they are not exclusive to the QA function. **(Changes 51, 78, 82, 95, 106)**

In no case were these determined to be reductions in commitment. They were determined to be acceptable changes since the baseline requirements of 10 CFR 71 and 10 CFR 72 were still being met if the proposed changes are implemented.

Category 4 - Changes in statements of requirement requiring evaluation for possible reductions in commitment.

There was only one change falling into this category (**Change 176**). It was determined that statements of requirement included in (Section) Criteria 18 - Audits regarding the obligations of suppliers of important to safety items relative to their QA programs were completely redundant to statements of requirement in (Section) Criterion 7 - Control of Purchased Materials, Parts and Components. Therefore, deleting the statements from Section 18 does not delete or reduce any baseline commitments if the proposed changes are implemented.

Any questions regarding these proposed changes may be addressed to me at 914-347-2345. Thank you for your consideration.

Very truly yours,

Steven C. White
Director, Corporate Quality Assurance
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