ENCLOSURE 5

RESPONSE TO REQUESTS FOR ADDITIONAL INFORMATION
REPLACEMENT DISCUSSION OF CHANGES

DOMINION NUCLEAR CONNECTICUT, INC.
VIRGINIA ELECTRIC AND POWER COMPANY

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, applicable to the Millstone facilities, is contained in the QAPD: "The provisions of the Millstone Unit 2 and 3 Technical Specifications paragraph 6.3.1.a." This alternative is acceptable because it 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. This alternative is applicable to the North Anna and Surry facilities and is acceptable based on being 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 and the individual filling the role of operations middle manager (supervisor shift operations) will meet the license requirements of North Anna Units 1 and 2 Technical Specification 5.2.2.e or Surry Units 1 and 2 Technical Specification 6.1.2.2.d as applicable."

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 qualification requirements that are commensurate with the tasks to be performed as discussed below.

(1) In lieu of being certified as Level I, II, or III in accordance with NQA-1-1994, personnel performing operations phase independent quality verification inspections, examinations, measurements, or tests of material, products, or activities will be required to possess qualifications equal to or better than those required for performing the task being verified; and the verification is within the skills of these personnel and/or is addressed by procedures. These individuals will not be responsible for the planning of quality verification inspections and tests (i.e., establishing hold points and acceptance criteria in procedures, and determining who will be responsible for performing the inspections), evaluating inspection training programs, nor certifying inspection personnel.

This alternative meets the requirements of 10 CFR 50, Appendix B, Criterion II, by requiring training and qualification of personnel that assures suitable proficiency in the skills necessary to perform quality verification inspections and tests is achieved and maintained. The individuals qualified in accordance with this alternative participate in an accredited SAT-based training program that meets 10 CFR 50.120.

This alternative is similar to the qualification requirements documented in the basis for the Nuclear Management Company Quality Assurance Topical Report (NMC QATR) Exception A.5 for NQA-1-1994, Supplement 2S-1 in Enclosure 3 of the NMC letter dated March 31, 2003 (ML033070161). The NMC QATR provides the minimum qualifications of the inspector conducting inspections, examinations or tests that are in the same organization as that which performed the work. The approval for this alternative was originally addressed in a letter from the NRC, Region III, to Consumers Power Company, Docket Nos. 50-155 and 50-255, dated February 27, 1992. The basis for this change is equal to that indicated in the NMC alternative in that (1) the same level of qualification is required, (2) the personnel will be required to have the necessary skills and/or have the verification requirements specified in procedures, and (3) where the work involves the breaching of a pressure boundary, additional assurance of the quality of work can be obtained through a functional test (addressed in DOM-QA-1, subsection 10.2). The inspection planning process, performed by personnel qualified in accordance with our commitment to NQA-1-1994, Supplement 2S-1 and Appendix 2A-1, takes the above three factors into account in establishing who will be responsible for performing the inspection. If the above three factors can not be met, the inspection responsibility would be assigned to personnel qualified in accordance with the commitment to NQA-1-1994.

(2) A qualified engineer may be used to plan inspections, evaluate the capabilities of an inspector, or evaluate the training program for inspectors. For the purposes of these functions, 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.

This alternative is considered acceptable in that it establishes education and experience requirements that are comparable to those established by NQA-1-1994, Appendix 2A-1, for the functions to be performed.

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. This was previously approved by NRC letter to E. A. Baum, dated October 6, 1982.

(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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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: • 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: • 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		
Section	**Millstone**	**North Anna/Surry**
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		
Section	**Millstone**	**North Anna/Surry**
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.)

MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Abstract	Introduction & Policy and Basis	NOTE 1. Eliminated – Redundant to Policy and introduction.	N	
Introduction	Introduction & Policy and Basis	NOTE 1. Abbreviated to global introduction, which refers to appropriate regulations and industry standards to ensure safety and quality. Basis section added to the QAPD.	N	
Policy Statement	Introduction & Policy and Basis	NOTE 1. Abbreviated to global statement ensuring safety and quality.	N	
1.1	1.1	NOTE 1.	N	
1.2	1.2.1	NOTES 1 & 2. Eliminated reference to Chief Executive Officer and President/Chief Operating Officer. Chief Nuclear Officer (CNO) actually has responsibility for Dominion nuclear plants.	N	
1.3		Reporting relationships were eliminated from the text, as they are described by the organization charts in Appendix A. Organization descriptions are made by functions with generic titles for responsible individuals, consistent with current 50.54(a)(3). 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	
1.3.1	1.2.2	NOTE 2	N	
1.3.2	1.2.3	NOTE 2	N	
1.3.3	1.2.3.1	NOTE 2	N	
1.3.4	1.2.3.2	NOTE 2	N	
1.3.5	1.2.6	NOTE 2	N	

***** R = Reduction in Commitment; N = Not a Reduction in Commitment; I = Increase in Commitment

MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
1.3.6	1.2.3.2 1.2.6 1.2.6.1 2.3	NOTE 2. 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.)	N	
1.3.7	1.2.3.1.b 1.2.3.1.c	NOTES 1 & 2.	N	
1.3.8	1.2.3.1.a 1.2.5 1.2.5.2.a	NOTE 2. Responsibility for Fire Protection moved from Operations to Protection Services.	N	
1.3.9	1.2.3.1.a	NOTES 2 & 3. Removed specific position description.	N	
1.3.9.1	1.2.3.1.a	NOTES 2 & 3. Removed specific position description.	N	
1.3.9.2	1.2.3.1.a	NOTES 2 & 3. Removed specific position description.	N	
1.3.9.3	1.2.3.1.a	NOTES 2 & 3. Removed specific position description.	N	
1.3.9.4	1.2.3.1.a	NOTES 2 & 3. Removed specific position description.	N	
1.3.9.5	1.2.3.1.a	NOTES 2 & 3. Removed specific position description.	N	
1.3.10	1.2.3.1.c	NOTES 2 & 3. Removed specific position description.	N	
1.3.11	1.2.3.1.d	NOTES 2 & 3. Removed specific position description.	N	
1.3.12	1.2.3.2.c 1.2.3.2.d	NOTE 2. “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.	N	
1.3.13	1.2.3.2.b Appendix A	NOTE 2. Sufficient organizational freedom and independence from operating pressures is depicted in Appendix A as an Operating Facility Organization reporting to the Management Position Responsible for Facility Safety & Licensing.	N	
1.3.14	1.2.3.2.a	NOTE 2.	N	
1.3.15	1.2.5.2 1.2.5.b	NOTES 1 & 2.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
1.3.16	1.2.5.2 1.2.5.2.a	NOTES 1 & 2.	N	
1.3.17	1.2.5.3 Appendix A	NOTE 2. Sufficient organizational freedom and independence from operating pressures is depicted in Appendix A as an Operating Facility Staff Reporting to Support Organizations.	N	
1.3.18	1.2.4.1 1.2.4.1.a 1.2.4.1.b 1.2.4.2	NOTE 2. The Engineering function descriptions are expanded to more clearly define their roles.	N	
1.3.19	1.2.5.4	NOTE 2.	N	
1.3.20	1.2.4.4	NOTE 2. The Information Technology descriptions are expanded to more clearly define their roles.	N	
1.4	Introduction and Policy	Section 1.4, “Quality-related responsibilities common to all Department Heads” was deleted as redundant to language in regulations, standards, and other parts of the QAPD. Generic responsibilities are contained within implementing procedures.	N	
1.5	1.2.6 2.3 Appendix B	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	
1.6	1.2.1	Responsibility for resolution of QA Program disputes has been moved from the Sr. VP – Dominion Nuclear Connecticut to the Dominion Chief Nuclear Officer.	N	
1.7	1.3	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.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
1.8	Appendix A	NOTE 2. Organizational Charts previously contained in Section 1.0 were relocated to Appendix A. Organizational charts are functionally oriented, not based on location.	N	
2.0	2.0	Qualification requirements previously contained throughout the QAP and/or in station Technical Specifications are contained in QAPD 2.0, Section 2.5	N	
2.1	2.1 2.2 Appendix C, Item 4	NOTE 1. Applicability of the program was included under Section 2.1 General Requirements and is now included under Section 2.2. A commitment to Reg. Guide 1.26, Rev. 3, concerning Quality Group Classifications, has been added to make the QAP consistent with the SAR with the alternative that the company does not use the specific A, B, C, or D quality groups set forth in this guide. However, the guidance on determining the importance to safety and ensuring appropriate QA requirements and requirements of codes and standards is applied to the SSCs. The practice used during initial construction and operations of the facilities as described in the applicable SAR is utilized.	N	
2.2.1	2.1	NOTE 1.	N	
2.2.2	N/A	Information within this section is either redundant to other sections or covered by existing regulations.	N	
2.2.3	2.4 Appendix C	Removed specific identification of safety-related structures, systems, and components (SSCs). SSCs are identified within each sites Safety Analysis Reports. Dominion remains committed to Reg. Guide 1.26 as identified in Appendix C of DOM-QA-1.	N	
2.2.4	1.2.6 2.3 18.4	NOTE 1. Administrative control of the QAP is performed in accordance with approved implementing procedures. Responsibility for review and approval of vendor Quality Assurance programs has been moved from Supply Chain Management to Nuclear Oversight.	N	

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2.2.5	2.5	NOTE 1. Reduced level of details that are included in NQA-1-1994, Supplement 2S-4.	N	
2.2.6	2.3 Appendix B	To establish a common fleet approach to management oversight of the QAP, Management provides oversight of the quality program implementation and effectiveness by reviewing the results of audits. Audits are performed under the cognizance of the MSRC.	N	
3.1	3.1 3.2 3.2.1 3.2.2 3.2.3	Revised and re-organized to remove redundancy and consolidate topics. 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. The specifics are addressed in implementing procedures. Departmental (including Engineering) responsibilities are discussed in QAPD Section 1.0, and not repeated throughout the QAPD.	N	
3.2	3.1 18.5	Information within this section is redundant to other sections. Audit scopes are discussed in Section 18.5.	N	
3.2.1	3.2 3.2.1	NOTE 1. Level of detail reduced. Details contained in NQA-1-1994 Supplement 3S-1.	N	
3.2.2	3.2.1 Appendix B	NOTE 1. Details are contained in NQA-1-1994, Supplement 3S-1. Management reviews are performed in accordance with Appendix B.	N	
3.2.3	3.2.2	NOTE 1.	N	
3.2.4	3.2.3 3.2.4	NOTE 1. Details are contained in NQA-1-1994, Supplement 3S-1. Software controls are in section 3.2.4.	N	
4.0	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.	N	
4.1	4.1	NOTE 1.	N	
4.2.1	4.1 4.2	NOTE 1. Details are contained in NQA-1-1994, Supplement 4S-1.	N	
4.2.2	4.2	NOTE 1. Details are contained in NQA-1-1994, Supplement 4S-1.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
4.2.3	4.2 7.2 18.4	NOTE 1. Information relocated to other sections of the QAP to be consistent with NQA-1-1994. Selection of Suppliers is in section 7.2 and the approved vendors list is in section 18.4.	N	
5.0	5.0	NOTE 1. 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. Requirements from Section 5 that are more appropriate to document control measures have been relocated to Section 6 to be consistent with NQA-1-1994.	N	
5.1	5.1	NOTE 1.	N	
5.2	5.1 7.2	NOTE 1. Verification of vendor quality assurance programs is described in section 7.2 and in NQA-1-1994, Supplement 7S-1.	N	
5.2.1	5.1 5.4 1.2.6 18.4	NOTE 1. Vendor quality programs are reviewed per section 18.4. Quality procedures, including vendor procedures used on site, are reviewed by Nuclear Oversight as described in section 1.2.6.	N	
5.2.2	5.1 6.1 6.2 6.3	NOTE 1. Drawing update in a timely manner is addressed in section 6.1. Drawing review and approval is addressed in section 6.3.	N	
5.2.3	5.1 6.3	NOTE 1. Document review and approval is described in section 6.3. Including adequate acceptance criteria is contained in NQA-1-1994, Basic Requirement 5.	N	
6.0	6.0	NOTE 1. 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.	N	
6.1	6.1	NOTE 1.	N	
6.2.1	6.2	NOTE 1.	N	
6.2.2	6.5	NOTE 1. Section revised to more accurately and completely describe the process of distributing controlled documents.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
6.2.3	6.5	NOTE 1. The document control process described applies to drawings, procedures, and instructions versus just drawings.	N	
6.2.4	6.5 1.2.6	NOTE 1. Nuclear Oversight responsibilities are contained in section 1.2.6.	N	
7.0	7.0	Control of Purchased Material, Equipment and Services details are described only above those stated in NQA-1 or other QAPD sections.	N	
7.1	7.1	NOTE 1.	N	
7.2	7.2	NOTE 1.	N	
7.2.1	7.2 7.4	NOTE 1.	N	
7.2.2	7.4	NOTE 1. Responsibilities for source inspection are expanded to other groups that may perform this activity. Description of activity enhanced to more accurately describe the activity.	N	
7.2.3	7.4 10.2	NOTES 1 & 5. Receipt inspection is a subset of the Inspection Program described in section 10.2. Responsibilities for receipt inspection are expanded to other groups.	N	
7.2.4	7.3	NOTE 1.	N	
7.2.5	7.3 7.5 Appendix C, 15.	Controls for commercial grade dedication are established using the guidance of EPRI NP-5652 as discussed in GL 89-02. Commitment addressed in Appendix C of DOM-QA-1	N	
8.0	8.0	Identification and Control of Materials, Parts and Components details are described only above those stated in NQA-1 or other QAPD sections.	N	
8.1	8.1 14.1	NOTE 1. Measures that assure the identification of inspections, tests, and operating status is made known to affected organizations is contained in Section 14.1.	N	
8.2	8.1	NOTES 1 & 5. Removed details contained in NQA-1-1994, Supplement 8S-1 and details more appropriate to implementing procedures.	N	
9.0	9.0	Control of Special Processes details are described only above those stated in NQA-1 or other QAPD sections.	N	

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9.1	9.1	NOTE 1.	N	
9.2	9.1	NOTE 1.	N	
9.2.1	9.2	NOTE 1.	N	
9.2.2	9.2 2.5.3.2 2.5.6	NOTE 1. Qualification of NDE personnel will be in accordance with NQA-1-1994, Supplement 2S-2, as clarified in DOM-QA-1. Responsibility for certification of NDE personnel expanded to be more generic. Changed reference from SNT-TC-1A to code required standard since later editions of the ASME code require qualification in accordance with ASNT CP-189.	N	
9.2.3	9.2 17.0 (All parts)	NOTE 1.	N	
10.0	10.0	Inspection details are described only above those stated in NQA-1 or other QAPD sections.	N	
10.1	10.1	NOTE 1. Provisions added to allow quality verification inspections by the Maintenance group.	N	
10.2.1	1.2.3.2.e 1.2.6.1.a 10.2	NOTES 1 & 5. Responsibilities for inspection are relocated to Section 1. 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.	N	
10.2.2	10.2	NOTES 1 & 5.	N	
10.2.3	10.1 10.3 6.5	NOTE 1. Access to documents necessary for the performance of inspections is assured through the document control program as described in section 6.5.	N	
10.2.4	10.1 10.2	NOTE 1. Removed details more appropriate to implementing procedures.	N	
10.2.5	10.2	NOTE 1. Removed details more appropriate to implementing procedures and details contained in NQA-1-1994, Supplement 10S-1.	N	

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10.2.6	10.3 2.7	Qualified individuals perform inspections including evaluating results. Inspection results evaluation requirements are contained in NQA-1-1994, Appendix 2A-1, Level II Personnel Capabilities as committed to by Section 2.7.	N	
11.0	11.0	Test Control details are described only above those stated in NQA-1 or other QAPD sections.	N	
11.1	11.1	NOTE 1. Additional information is included for initial start-up and construction issues to address potential new facilities.	N	
11.2.1	11.1	NOTE 1.	N	
11.2.2	11.2	NOTES 1 & 5.	N	
11.2.3	11.2 12.1 12.2	NOTE 1. Controls to ensure test equipment are properly calibrated at regular intervals and appropriate for the circumstances are described in sections 12.1 and 12.2.	N	
11.2.4	11.3	NOTE 1.	N	
12.0	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.	N	
12.1	12.1	NOTE 1.	N	
12.2.1	12.1	NOTE 1.	N	
12.2.2	12.1	NOTES 1 & 5.	N	
12.2.3	12.1	NOTES 1 & 5.	N	
13.0	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.	N	
13.1	13.1	NOTE 1.	N	
13.2.1	13.1	NOTE 1.	N	
13.2.2	13.2	NOTES 1 & 5.	N	
14.0	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.	N	
14.1	14.1	NOTE 1.	N	

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14.2.1	14.1	NOTES 1 & 5. Receipt inspection is described in sections 7.4 and 10.	N	
14.2.2	14.2	NOTE 1.	N	
15.0	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.	N	
15.1	15.1	NOTE 1.	N	
15.2.1	15.1	NOTE 1.	N	
15.2.2	15.3	NOTES 1 & 5.	N	
15.2.3	15.3	NOTES 1 & 5.	N	
15.2.4	15.3	NOTE 1.	N	
16.0	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.	N	
16.1	16.1	NOTE 1.	N	
16.2.1	16.2	NOTE 1.	N	
16.2.2	16.2 16.3	NOTES 1 & 5.	N	
16.2.3	16.2 16.3	NOTES 1 & 5.	N	
17.0	17.0	Quality Assurance Records details are described only above those stated in NQA-1 or other QAPD sections. Similar content from existing program.	N	
17.1	17.1	NOTE 1.	N	
17.2	17.1 17.2	NOTES 1 & 5.	N	
17.3	17.3	NOTES 1 & 5.	N	
18.0	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.	N	

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18.1	18.1	NOTE 1.	N	
18.2.1	18.2 18.3 18.5	NOTES 1 & 5.	N	
18.2.2	18.3	NOTES 1 & 5.	N	
18.2.3	18.3	NOTES 1 & 5.	N	
18.2.4	18.1	NOTES 1 & 5.	N	
Appendix A U2/3 Cat I SSCs	2.4	NOTES 1 & 5. 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. Specific lists of structures, systems, and components covered by the QAP have been removed. This information is contained in each facility's safety analysis reports.	N	
Appendix A Consumables	2.4 4.0 (All parts)	NOTES 1 & 5. Consumables are addressed through the procurement process (described in Section 4 of DOM-QA-1) that takes into account the consumable's importance to the safety functions of the SSC.	N	
Appendix B Q&E Requirements	2.5, Appendix C	NOTE 1. Millstone's previous Appendix B contained information available in ANSI N18.1 and/or Reg. Guide 1.8. Per current 10 CFR 50.54(a) requirements, this information is not repeated in the consolidated QAPD. The Qualification & Experience requirements are relocated to section 2.5.	N	
Appendix B Q&E Requirements (cont.)	2.5, Appendix C (cont.)	Qualification requirements for support staff, including Quality Assurance & Quality Control, have been changed to ANSI/ANS 3.1-1993 as endorsed by Reg. Guide 1.8, Rev. 3, May 2000 with the alternatives listed in the next row.	I	
Appendix B Q&E Requirements (cont.)	2.5, Appendix C (cont.)	Reg. Guide 1.8, Rev 3, Section C, paragraphs 2.1.1 & 2.1.3, have been expanded to allow the responsible executive approval of education & experience equivalents in addition to the plant manager.	R	This alternative is acceptable because the approval authority remains with the plant manager or higher-level authority.

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix B Q&E Requirements (cont.)	2.5, Appendix C (cont.)	Reg. Guide 1.8, Rev 3, Section C, paragraphs 2.1.2, 2.11, & 2.12 have been modified to replace references to ANSI/ASME NQA-1-1983 with ANSI/ASME NQA-1-1994. This alternative is necessary to clearly identify the commitment documents and provides consistency throughout the QA program. Exelon SER (Ref. ML023440300) indicated that NQA-1-1994 was equivalent to NQA-1-1983.	N	
Appendix B Q&E Requirements (cont.)	2.5, Appendix C (cont.)	Contains an alternative to ANSI N18.1-1971, subsection 4.2.2, for Operations Manager qualifications. Previously approved by license amendment.	N	
Appendix B Q&E Requirements (cont.)	2.5, Appendix C (cont.)	Contains an alternative to ANSI N18.1-1971, subsection 4.3.1, for Supervisors Requiring AEC Licenses. Previously approved by license amendment.	N	
Appendix C Commitments List	Appendix C	NOTE 1. Millstone Appendix C contained Millstone specific commitments. Appendix C now contains both Dominion commitments and alternatives as applicable. In addition, each individual section defines a quality standard reference.	N	
Appendix C - commitment to 10 CFR 50, App. B	Introduction, Basis, Section 2	Millstone is still committed to regulatory requirements.	N	
Appendix C – commitment to 10 CFR 50.54		Regulatory requirement, no need to specify as a commitment.	N	
Appendix C – commitment to 10 CFR 50.55 and its App. A		Regulatory requirement, no need to specify as a commitment.	N	

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Appendix C – Reg. Guide 1.8, Rev. 1R, and ANSI 18.1-71	Appendix C, Item 1	Commitment retained.	N	
	Appendix C, Item 3	DOM-QA-1 commits to a newer standard (ANS-3.1-1993) for selection, training, and qualification of personnel in support organizations and for Quality Control Inspection and Audit Supervision/Management. This standard has been approved by NRC Reg. Guide 1.8, Rev. 3. Specific Alternatives for this Reg. Guide and Standard are addressed below. This allows a common standard for these personnel who may support multiple facilities.	N	
	Appendix C, Item 3, Alternative 1	This alternative to Reg. Guide 1.8, Rev. 3, Regulatory Position paragraphs 2.1.1 and 2.1.3 allows the group's responsible executive (vice president) to approve equivalents to education and experience.	R	This alternative provides an equivalent level of approval, but assigns that responsibility to the executive responsible for the support group.
	Appendix C, Item 3, Alternative 2	This alternative to Reg. Guide 1.8, Rev. 3, Regulatory Position paragraphs 2.1.2, 2.3, 2.11, and 2.12 modifies the reference to the edition of NQA-1 from 1983 to 1994. This alternative is necessary to clearly identify the commitment documents and provides consistency throughout the QA program. Exelon SER (Ref. ML023440300) indicated that NQA-1-1994 was comparable to NQA-1-1983.	N	
	Appendix C, Item 4	Adds a conditional commitment to Reg. Guide 1.26, Rev. 3, based on the commitment addressed in the applicable facility SAR. The alternative that indicates that the specific A, B, C, and D quality groups of the guide are not used is retained. This maintains consistency with the classification programs presently in use at the facilities.	I	

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Appendix C – Reg. Guide 1.28, 2/79, and ANSI N45.2-77	Appendix C, Item 5	Updated commitment to Reg. Guide 1.28, Rev. 3, 8/85, endorsing NQA-1-1983. Updated commitment to NQA-1-1994 based on NRC SER for Exelon's QA program (Ref. ML023440300).	N	
	Appendix C, Item 7	Adds conditional commitment to Reg. Guide 1.29, 9/78 as described in the applicable facility SAR.	N	
Appendix C – Reg. Guide 1.30, 8/72, and ANSI N45.2.4-72	Appendix C, NQA-1-1994, Subpart 2.4 (ANSI/IEEE Std. 336-85)	Updated commitment to the more recent ANSI Standard incorporated in NQA-1-1994.	R	Subpart 2.4 of NQA-1-1994 contains equivalent requirements to N45.2.4-72 with the Regulatory Position of Reg. Guide 1.30, 8/72. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
Appendix C – Reg. Guide 1.33, 2/78, and ANSI N18.7-76	Appendix C, Item 8	Commits to implement parts of Reg. Guide 1.33, 2/78. In lieu of a commitment to ANSI N18.7-76, the applicable parts of NQA-1-1994 will be used and augmented with additional administrative requirements as documented in DOM-QA-1.	R	Comparable administrative controls and QA requirements are established through the program. These are evaluated throughout Attachments 3 and 4 of the August 24, 2004 submittal of DOM-QA-1, Rev. 0.
Appendix C – Reg. Guide 1.37, 3/73 and ANSI N45.2.1-1973	Appendix C, Item 6	NQA-1-1994, Subpart 2.1, replaces ANSI N45.2.1-1973.	R	Subpart 2.1 of NQA-1-1994 contains equivalent requirements to N45.2.1-1973 with the Regulatory Position of Reg. Guide 1.37, 3/73. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.

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Appendix C – Reg. Guide 1.38, 5/77 and ANSI N45.2.2-1972	Appendix C, Item 6	NQA-1-1994, Subpart 2.2, replaces ANSI N45.2.2-1972	R	Subpart 2.2 of NQA-1-1994 contains equivalent requirements to N45.2.2-1972 with the Regulatory Position of Reg. Guide 1.38, 5/77. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
Appendix C – Reg. Guide 1.39, 9/77 and ANSI N45.2.3-1973	Appendix C, Item 6	NQA-1-1994, Subpart 2.3, replaces ANSI N45.2.3-1973.	R	Subpart 2.3 of NQA-1-1994 contains equivalent requirements to N45.2.3-1973 with the Regulatory Position of Reg. Guide 1.39, 9/77. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
Appendix C – Reg. Guide 1.58, 9/80 and ANSI N45.2.6-1978	Appendix C, Items 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of the NQA-1 requirements for training and qualification of inspection personnel. Reg. Guide 1.58 has been withdrawn by the NRC. Refer to NQA-1-1994, Part I, Supplement 2S-1 and Part III, Appendix 2A-1 for program requirements.	N	
Appendix C – Reg. Guide 1.64, 6/76 and ANSI N45.2.11-1974	Appendix C, Items 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of NQA-1 requirements for Design Control. Reg. Guide 1.64 has been withdrawn by the NRC. Refer to NQA-1-1994, Part I, Basic and Supplemental requirements (3) related to Design Control for program requirements.	N	

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Appendix C – Reg. Guide 1.70, 6/66 and 11/78	Introduction	Reg. Guide 1.70 is not a quality assurance standard, but provides guidance on the content of Safety Analysis Reports, including chapter 17 for Quality Assurance Programs. The guidance from this Reg. Guide has been updated through the Standard Review Plan, NUREG-0800.	N	
Appendix C – Reg. Guide 1.88, 10/76 and ANSI N45.2.9-1974	Appendix C, Items 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of NQA-1 requirements for control of records. The Reg. Guide also contains a table of records retention types and time periods. Reg. Guide 1.88 has been withdrawn by the NRC. Refer to NQA-1-1994, Part I, Basic and Supplemental requirements (17) for program requirements.	N	
Appendix C – Reg. Guide 1.94, 4/76 and ANSI N45.2.5-1974, plus Section 6.11 of ANSI N45.2.5-1978	Appendix C, Item 6	NQA-1-1994, Subpart 2.5, replaces ANSI N45.2.5-1978 and includes the appropriate guidance of the Regulatory Position of Reg. Guide 1.94, 4/76.	R	Subpart 2.5 of NQA-1-1994 contains equivalent requirements to N45.2.5-1974 and N45.2.5-1978 with the Regulatory Position of Reg. Guide 1.94, 4/76. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
Appendix C – Reg. Guide 1.116, 5/77 and ANSI N45.2.8-1975	Appendix C, Item 6	Clarification not required under this change. This was information needed for a specific project (reactor vessel head replacement) that is completed.	R	Subpart 2.8 of NQA-1-1994 contains equivalent requirements to N45.2.8-1975 with the Regulatory Position of Reg. Guide 1.116, 5/77. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix C – Reg. Guide 1.123, 7/77 and ANSI N45.2.13-1976	Appendix C, Item 6.	NQA-1-1994, Part I, Basic and Supplemental requirements (4, 7, 8, 13) address the programmatic requirements previously contained in N45.2.131976. Reg. Guide 1.123 has been withdrawn by the NRC.	N	
Appendix C – Reg. Guide 1.144, 9/80 and ANSI N45.2.12-1977	Appendix C, Items 5 and 6	Reg. Guide 1.28, Rev. 3, addresses quality assurance auditing during design and construction phases. The guidance for external auditing will also be implemented during the operational phase. NQA-1-1994 establishes requirements for auditing that are comparable to those of N45.2.12-1977. Reg. Guide 1.144 has been withdrawn by the NRC.	N	
Appendix C – Reg. Guide 1.146, 8/80 and ANSI N45.2.23-1978	Appendix C, Item 6	NQA-1-1994 addresses comparable requirements for qualification of quality assurance auditors in Supplemental Requirements 2S-3. Reg. Guide 1.28 has been withdrawn by the NRC.	N	
Appendix C – Reg. Guide 1.152, 01/96 and IEEE ANS 7-4.3.2-1993	Appendix C, Item 11	Commitment to Reg. Guide 1.152, Jan. 1996 has been modified with an alternative to replace references to ASME NQA-1 and ASME NQA-2 with NQA-1-1994. This alternative is acceptable because it provides consistency with the remainder of the QAPD.	N	
	Appendix C, Item 6	Adds a commitment to implement the requirements of Subpart 2.15 to NQA-1-1994 with one alternative. This subpart addresses hoisting, rigging, and transporting. ANSI N45.2.2-1972 only included a small part of the information in this subpart. Use of this standard includes one alternative regarding not using the specific designations of Category A, B, or C when determining the controls to apply to the lift. The alternative is acceptable in that items will be reviewed against the requirements to establish the minimum controls to be implemented, but may not specifically use these category designations. This maintains consistency with the existing programs.	I	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
	Appendix C, Item 6	Adds a commitment to implement the requirements of Subpart 2.16 to NQA-1-1994 regarding measuring and test equipment with two alternatives. (1) Changes references to NQA-1-1994 and the QAPD for consistency throughout the QA program. (2) Addresses the use of records in lieu of labeling for installed equipment. This alternative is necessary because it is not practical to include all the required information on labels affixed to the installed devices. Each item is identified with a unique number and the records, traceable to that number, will provide an equivalent level of information.	I	
	Appendix C, Item 6	Adds a commitment to implement the requirements of Subpart 2.18 to NQA-1-1994 for maintenance, with two alternatives. (1) Changes reference to ANS-3.2 to the QAPD to maintain consistency throughout the QA program. (2) Makes the requirement to have the description of work reference the applicable maintenance procedures to a recommendation. Although this is generally the practice, it is recognized that the responsibility for ensuring the correct procedures are used for the activities rests with the maintenance supervisor and lead technician for the work.	I	
	Appendix C, Item 6	Adds a commitment to implement the requirements of Subpart 2.20 to NQA-1-1994 for Subsurface Investigations for the construction of a nuclear plant. This would apply to new construction.	I	
	Appendix C, Item 9	Added conditional commitment to Reg. Guide 1.36, Rev 0, 2/73. Not a previous commitment for existing plants.	N	
	Appendix C, Item 10	Added conditional commitment to Reg. Guide 1.54, Rev. 0, 6/73 and ANSI N101.4-1972, since the commitment was site specific. Applicability of the requirements of the guide will be determined as needed.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
	Appendix C, Item 12	Added conditional commitment to Reg. Guide 1.143, Rev. 2, 11/01, since the commitment was site specific. The applicable requirements will be used for plant modifications on a case-by-case basis.	N	
	Appendix C, Item 13	Added commitment to Reg. Guide 4.15, Rev. 1, 2/79 that was previously addressed in licensing basis documents.	N	
	Appendix C, Item 14	Added commitment to Reg. Guide 7.10, Rev. 1, 6/86 that was previously addressed in licensing basis documents.	N	
	Appendix C, Item 15	Added commitment to GL 89-02 and EPRI-NP-5652 that was previously addressed in licensing basis documents. The Company commits to use the endorsed industry guidance regarding the selection and qualification of commercial grade Suppliers and for the dedication of commercial grade items used in applications important to safety.	N	
	Appendix C, Item 16	Added commitment to BTP ASB/CMEB 9.5-1. 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.	N	
Appendix D Glossary of Terms	Appendix D	NOTE 1. Millstone Appendix D contained Millstone specific definitions. NQA-1 contains most 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.	N	
Appendix E	Appendix C	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	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix E – 1.		Exception no longer needed. NQA-1-1994, Supplement 17S-1 replaced ANSI N45.2.9 and specifies 2-hr fire ratings for vaults.	N	
Appendix E - 3.		Exception no longer needed. NQA-1-1994, Supplement 17S-1 replaced ANSI N45.2.9 and requires submittal of completed records to the storage facility without unnecessary delay. Time limits for transmittal of working documents is contained within implementing procedures.	N	
Appendix E – 4		Exception no longer needed. NQA-1-1994, Supplement 3S-1 replaced Reg. Guide 1.64 and incorporates provisions for adequate independent design verification.	N	
Appendix E – 5.		Exception withdrawn. Dominion will comply with NQA-1-1994, Supplement 7S-1, section 8.2.4.	N	
Appendix E – 6.		Exception no longer needed. NQA-1-1994, Subpart 2.2, contains similar requirements.	N	
Appendix E – 7.	2.5.1.1 Appendix C, Item 1	Millstone exception is incorporated into section 2.5.1.1 and Appendix C, Item 1, Reg. Guide 1.8, Revision 1-R (Reissued May 1977). Not a reduction in commitment because this alternative was previously approved through license amendments 178 & 190 for U2 and 132 for U3.	N	
Appendix E – 8.	2.5.1.1 Appendix C, Item 1	Millstone exception is incorporated into section 2.5.1.1 and Appendix C, Item 1, Reg. Guide 1.8, Revision 1-R (Reissued May 1977). Not a reduction in commitment because this was previously approved through license amendments 178 & 190 for U2 and 132 for U3.	N	
Appendix E – 9.	Appendix C, Item 8.5	This exception is incorporated into DOM-QA-1, Appendix C, Item 8, Reg. Guide 1.33, Rev. 2, Feb. 1978, subparagraph 5. The alternatives were previously approved through license amendments 79, 184, and 104 for MP 1, MP 2, and MP 3, respectively.	N	
Appendix E -.11.		This exception is no longer needed.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix E – 13.	Introduction	No longer needed. DOM-QA-1 is formatted similar to NUREG-0800, Sections 17.1 and 17.2 as explained in the QAP Introduction, in lieu of Reg. Guide 1.70.	N	
Appendix E – 14.	6.3 Appendix C, Item 8	No longer needed. Procedure review is discussed in Section 6.3, providing requirements that provide a level of assurance of the quality of procedures that is comparable to ANSI N18.7-1976. The Dominion commitment to ANSI N 18.7 is discussed in DOM-QA-1, Appendix C, Item 8, Reg. Guide 1.33, Rev. 2, Feb. 1978, subparagraph 1.	N	
Appendix E – 16.	18.5 Appendix C, Item 8 Appendix D	No longer needed. Audit frequencies are discussed in DOM-QA-1, Section 18.5 and Appendix C, Item 8, Reg. Guide 1.33, Rev. 2, Feb. 1978, subparagraph 5. Time Intervals are defined in DOM-QA-1, Appendix D and includes an appropriate grace period that is comparable to that allowed by the facility Technical Specifications.	N	
Appendix E – 17.	2.5.1.1 Appendix C, Item 1	Millstone exception is incorporated into Section 2.5.1.1 and Appendix C, Item 1, Reg. Guide 1.8, Revision 1-R (Re-issued May 1977), subparagraph 2. Not a reduction in commitment because this alternative was previously approved by license amendment 258 for MPS 2.	N	
Appendix E –18.	2.5.1.1 Appendix C, Item 1	Millstone exception is incorporated into Section 2.5.1.1 and Appendix C, Item 1, Reg. Guide 1.8, Revision 1-R (Re-issued May 1977), subparagraph 2. Not a reduction in commitment because this alternative was previously approved by license amendment 199 for MPS 3.	N	
Appendix E – 19.	2.5.1.1 Appendix C, Item 1	Millstone exception is incorporated into Section 2.5.1.1 and Appendix C, Item 1, Reg. Guide 1.8, Revision 1-R (Re-issued May 1977), subparagraph 3. Not a reduction in commitment because this alternative was previously approved by license amendment 258 for MPS 2.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix E – 20.	2.5.1.1 Appendix C, Item 1	Millstone exception is incorporated into Section 2.5.1.1 and Appendix C, Item 1, Reg. Guide 1.8, Revision 1-R (Re-issued May 1977), subparagraph 3. Not a reduction in commitment because this alternative was previously approved by license amendment 199 for MPS 3.	N	
Appendix F	Appendix B	Information now contained in Appendix B or has been placed in related sections and/or implementing procedures.	N	
Appendix F SNS	Appendix B, Item 5.0	NOTES 1 and 2. Relocated requirements to DOM-QA-1, Appendix B, Item 5.0, Independent Nuclear Safety Review. Independent Safety Engineering Group (ISEG) functions previously transferred to SNS and minimum full-time engineers reduced to four members-Submitted in Revision 25 (Based on NRC SER to Perry Nuclear, dated September 16, 1998, TAC MA3325.)	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix F SORC	Appendix B, Items 2 & 4	NOTES 1 and 2. SORC membership requirements, quorum and review responsibilities have been modified and are described in Appendix B, Item 4.0, 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. Although this is a change in the number of members previously specified in the QA Program, it does not reduce the membership below that described in the committed standard. The requirements for a quorum will be dependent of the membership determined to be necessary for the facility at any point in operations. If more members are desired, the minimum number needed for a quorum will increase. Qualification requirements are in Appendix B, Item 2.0. 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. This is a standard previously endorsed by the NRC and is therefore not a reduction in commitment.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix F MSRC	Appendix B, Items 2.0 & 3.0	NOTES 1 and 2. Relocated to Appendix B, Item 3.0, Management Safety Review Committee (MSRC). Qualifications are discussed in Appendix B, Item 2.0, Qualifications. Relocated discussion of Audit Program requirements to Section 18 of the QAPD. No longer requires MSRC to complete a review of Technical Specification or license amendments prior to submittal to NRC, however, the facility safety review committee will be required to perform this review prior to submittal to the NRC. This is consistent with the requirements of ANSI N18.7-1976 and at least one review group will be performing the review prior to NRC submittal. This meets the intent of Reg. Guide 1.33, Regulatory Position C.3, that states that these changes "should be reviewed by the independent review body prior to their submittal to the Commission for approval."	N	
Appendix F Qualified Reviewer Program	6.3	NOTE 1. Specific requirements for the Station Qualified Reviewer Program have been removed and are contained in implementing procedures as described in Section 6.3, Document Review and Approval. The QA program still requires qualified personnel to independently review procedures and procedure changes as part of the approval process.	N	
Appendix F Safety Limit Violation U2 & 3		"Safety Limit Violation" was eliminated from the QAPD. The requirements are covered in 10 CFR 50.36 and 10 CFR 50.72 regulations and Technical Specifications. Internal reporting requirements are covered in implementing procedures.	N	
Appendix F Record Retention U1 & 2	17.2; Appendix E	Additional QA Records requirements located Appendix E of DOM-QA-1. Per Section 17.2 – design, construction, and start-up record retention is based on Reg. Guide 1.28, Regulatory Position C.2, Table 1. Operations phase records retention is based on similar records to those of construction and Appendix E.	N	

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MPS QAPTR Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Appendix F Record Retention U3	17.2; Appendix E	Requirements relocated. Per Section 17.2 – design, construction, and start-up record retention is based on Reg. Guide 1.28, Regulatory Position C.2, Table 1. Operations phase records retention is based on Appendix E.	N	
Appendix G TS Position Cross Reference – Tables for Units 1, 2, and 3		Millstone Appendix G, a cross-reference list of Technical Specification titles to Site Specific titles is removed. This level of detail will be contained in implementing documents. (Pending approval of the TS changes.) 10 CFR 50.54(a) allows use of generic position descriptions in the QA program.	N	

NOTE 1: Commitments remain the same, wording changes made to reflect a consistent format and level of detail for Dominion fleet operations.
NOTE 2: Changed site specific titles to generic title descriptions and depicts reporting relationships through organization charts.

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Abstract	Introduction and 2.1	NOTE 1	N	
17.2.0	Policy	NOTE 1	N	
17.2.0.1	Introduction	NOTE 1	N	
17.2.0.2	Introduction and Basis	NOTE 1	N	
Table 17.2-0 Introductory Statement	Appendix C	NOTE 1	N	
Generic Statements RE: Table 17.2-0 & the Operation QAP	Introduction and Section 2.1	NOTE 1, also definitions are addressed in Appendix D rather than in the listing of commitments.	N	
17.2.1	1.0	NOTE 1 – Overall change to the Organization section was to use generic descriptive designations for key management and groups discussing their functions. Reporting relationships are not described in the text but shown in the charts comprising Appendix A of the new QA program description, DOM-QA-1.	N	
17.2.1.1A	1.1	NOTE 1, The cross-reference of titles will be contained in company administrative documents.	N	
17.2.1.1B	1.1; 1.2.2; 1.2.3	NOTE 1	N	
17.2.1.1C	1.1; 1.2.4	NOTE 1	N	
17.2.1.1D	1.1; 1.2.5	NOTE 1	N	
17.2.1.1E	1.1; 1.2.6	NOTE 1	N	
17.2.1.2		Heading eliminated due to format change.	N	
17.2.1.2A	1.2.1	NOTE 1	N	
17.2.1.2A.1	Appendix A; Appendix B, 3.0	NOTE 2 – Reporting relationship shown in Appendix A. The discussion of the MSRC function is located in Appendix B to present a consistent format. A change to the SPS Technical Specifications is being processed at the same time to relocate their MSRC information into the new QA program description. The discussion of changes to the MSRC will be Addressed with VEP-1-5A, Appendix C.	N	
17.2.1.2B	1.2.2	NOTE 1	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
17.2.1.2B.1	1.2.3; 1.1, ¶3	NOTE 1	N	
17.2.1.2B.1.a	Appendix A; Appendix B, 4.0	NOTE 2 – Reporting relationship shown in Appendix A. The discussion of the SNSOC (Facility Safety Review Committee) function is located in Appendix B to present a consistent format. A change to the SPS Technical Specifications is being processed at the same time to relocate their SNSOC information into the new QA program description. The discussion of changes to the SNSOC will be Addressed with VEP-1-5A, Appendix C.	N	
17.2.1.2B.1.b	1.2.3.1	NOTE 1	N	
17.2.1.2B.1.b.b.1	1.2.3.1.a	NOTE 1	N	
17.2.1.2B.1.b.b.1.1	1.2.3.1.a; Appendix A	NOTES 1 & 2 – Qualification requirements are addressed in the committed standards and Section 2 of DOM-QA-1.	N	
17.2.1.2B.1.b.b.2	1.2.3.1.b; Appendix A	NOTES 1 & 2	N	
17.2.1.2B.1.b.b.3	1.2.3.1.c; Appendix A	NOTES 1 & 2	N	
17.2.1.2B.1.b.b.4	1.2.3.1.d, Appendix A	NOTES 1 & 2	N	
17.2.1.2B.1.c	1.2.3.2	NOTE 1	N	
17.2.1.2B.1.c.c.1	1.2.3.2.b; Appendix A	NOTE 1 – SNSOC is addressed in Appendix B of DOM-QA-1.	N	
17.2.1.2B.1.d	Appendix A	NOTE 2 – Appendix A shows the reporting relationship, the responsibilities of each functional group is described in their applicable section. Specific responsibilities are further defined in Company administrative procedures that are controlled in accordance with the QA program.	N	
17.2.1.2B.1.e	Policy; Section 2	Training and qualification requirements stated in the QA Standards are not repeated herein.	N	
17.2.1.2C	1.2.6; Appendix A	NOTES 1 & 2	N	
17.2.1.2C.1	1.2.6.1; Appendix A	NOTES 1 & 2	N	
17.2.1.2C.2	1.2.6; Appendix A	NOTES 1 & 2	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
17.2.1.2C.3	1.2.6; Appendix A	NOTES 1 & 2	N	
17.2.1.2D	1.2.4	NOTE 1	N	
17.2.1.2D.1	1.2.4.4	NOTE 1	N	
17.2.1.2D.2	1.2.4.2	NOTE 1	N	
17.2.1.2D.3	1.2.4.1	NOTE 1	N	
17.2.1.2D.3.a	1.2.4.1.b	NOTE 1	N	
17.2.1.2D.3.b	1.2.4.1.a	NOTE 1	N	
17.2.1.2D.3.c	1.2.4.1	NOTE 1 - Due to differences in organizational structure between sites, this responsibility is addressed at the higher level management position. The function is retained within the Engineering organization.	N	
17.2.1.2D.4	1.2.4.3	NOTE 1	N	
17.2.1.2E	1.2.5	NOTE 1	N	
17.2.1.2E.1	1.2.5.1	NOTE 1	N	
17.2.1.2E.2	1.2.5.2; 1.2.5.2.a; 1.2.5.2.b	NOTE 1	N	
17.2.1.2E.3	1.2.5.3	NOTE 1	N	
17.2.1.2E.4	1.2.5.4	NOTE 1	N	
17.2.1.3	1.1	NOTE 1 – The QA program is consistent with the license requirements in the Technical Specifications so those requirements will continue to be met.	N	
17.2.2	2.0	NOTE 1	N	
17.2.2.1	2.1; 2.2; 2.3	NOTE 1	N	
17.2.2.2	Introduction	NOTE 1	N	
17.2.2.3	2.4	NOTE 1 – The specific term, Q-List, is not used since different sites use a different named document/program to identify the classification of SSCs. The applicable SAR provides the necessary information.	N	
17.2.2.4	2.3; 18.5	NOTE 1	N	
17.2.2.5, ¶1	2.5.3; 2.5.3.1	Change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3.	N	
17.2.2.5, ¶2	2.5.3; 2.5.3.1	Change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
17.2.2.5, ¶3	2.5.3; 2.5.3.2	Change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3.	N	
17.2.2.5, ¶4	2.5.3; 2.5.3.2	Change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3.	N	
17.2.2.5, ¶5	2.5.3	Because of the change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3, the alternate Standard in this statement will no longer be used.	N	
17.2.2.6 ¶1	2.5.3.2	Change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3.	N	
17.2.2.6 ¶2	2.5.3.1	Change to a more recent standard for qualification that was NRC approved through Reg. Guide 1.8, Rev. 3.	N	
17.2.2.7	2.5.3.2; 2.5.4	NOTE 1	N	
17.2.2.8	2.5.3.2; 2.5.5; 2.5.6; 2.5.7	NOTE 1 – For NDE technicians, the standard for qualification is changed from SNT-TC-1A to the standard required by the governing code for the activity. For NDE technicians, the Code governing the activity may specify a different qualification standard, such as ASNT CP-189. Acceptable in order to maintain consistency between codes and standards applicable to the activity.	N	
17.2.3	3.0-3.3.3	NOTE 1 – Responsibilities are addressed in Section 1 of DOM-QA-1. Specific program document names are not used, rather more generic descriptive terms are used to allow for differences between sites. SNSOC information is relocated to Appendix B of DOM-QA-1.	N	
17.2.4	4.0-4.3	NOTE 1	N	
17.2.5	5.0-5.5	NOTE 1 – Relocated information regarding procedure changes to Section 6 consistent with Criterion 6. Added in applicable information regarding procedures and their content from ANSI N18.7-1976.	N	
17.2.6	6.0-6.6	NOTE 1 – Incorporated information regarding procedure changes that was previously in Section 6. Review requirements for onsite safety review committee (SNSOC) addressed in Appendix B, § 4.0	N	
17.2.7	7.0-7.5	NOTE 1	N	
17.2.8	8.0-8.2	NOTE 1	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
17.2.9	9.0-9.3	NOTE 1	N	
17.2.10	10.0-10.4	Section reformatted to reduce the level of detail. Removed the statement about performing physical inspections at random intervals since the inspections are planned. Identification of the groups performing quality control inspections, NDE, and ASME VT is contained in Section 1 (Organization). Committed standard for qualification of inspection and test personnel changes from N45.2.6-1978 to NQA-1-1994.	R	This change is addressed with the overall change to NQA-1-1994 under the specific commitments to Reg. Guides and ANSI Standards – Refer to VEP-1-5A, Appendix B, Table 17.2.0; and DOM-QA-1, Appendix C.
17.2.11	11.0-11.5	NOTE 1	N	
17.2.12	12.0-12.3	NOTE 1 – DOM-QA-1 adds discussion of alternatives to NQA-1-1994 requirements that are necessary for consistent application. Alternatives to NQA-1-1994 requirements are addressed in the Discussion of Changes text.	N	
17.2.13	13.0-13.3	NOTE 1 – DOM-QA-1 includes discussion of alternatives to the applicable QA standard for this Section that were included in Table 17.2.0 of VEP-1-5A. Alternatives to be discussed under the change related to Table 17.2.0 of VEP-1-5A.	N	
17.2.14	14.0-14.3	NOTE 1 – DOM-QA-1 adds information to address quality requirements and administrative controls previously contained in ANSI N18.7-1976.	N	
17.2.15	15.0-15.4	NOTE 1	N	
17.2.16	16.0-16.4	NOTE 1 – Reporting requirements from regulations and technical specifications are controlled through procedure and that level of detail is not contained in DOM-QA-1. Corrective maintenance is addressed in NQA-1-1994, Subpart 2.18 and not repeated in this Section of the QA program. SNSOC review requirements are addressed in Appendix B of DOM-QA-1. Inspection program requirements are addressed in Section 10 of DOM-QA-1.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
17.2.16.1	1.	Relocated information regarding "Stop Work" to discussion of specific groups' responsibility/authority to stop work. Level of detail changed, how the program will be implemented is addressed in implementing procedures. This allows for addressing specific management responsibilities for the various groups responsible for inspection activities.	N	
17.2.16.2		Details on implementation of the program are identified in the implementing procedures to account for some variations between sites.	N	
17.2.17	17.0-17.4	NOTE 1	N	
17.2.18	18.1-18.6	NOTE 1 – VEP-1-5A states that the audit program is described in the Technical Specifications for SPS and Appendix C for NAPS. That information is relocated to Section 18 of DOM-QA-1.	N	
17.2 References		This level of detail was not included in the consolidated QA program. The facilities will be operated in accordance with their approved Technical Specifications as required by the license.	N	
Appendix A Figures of Nuclear Organization	Appendix A	Figures reformatted to depict functional organizations and use generic descriptions that are common for multiple sites where actual titles may be different. Equivalent reporting structure is retained.	N	
Appendix B Tables		No separate Appendix of Tables is used. The actual changes are addressed relative to each table below.	N	
Table 17.2.0	Appendix C	Both Appendices contain the list of quality assurance commitments along with acceptable alternatives. The actual changes are discussed in the below sections.	N	
Each Reg. Guide and any associated ANSI Standard from Table 17.2.0 is discussed below including any exceptions, alternatives, and clarifications in succeeding rows. Each Reg. Guide/ANSI Std commitment is separated by heavier horizontal lines.				

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Reg. Guide 1.8, 2nd Proposed Rev. 2, 9/80	Appendix C, Commitments 2 and 3	Because the technical specifications state that the staff for operating the plant are qualified to this Reg. Guide and associated standard, this will be retained for DOM-QA-1. For support organizations, particularly those performing activities for more than one facility, their training and qualification will be to the Rev. 3 version of the Reg. Guide, as discussed below.	N	
ANSI/ANS-3.1, Draft 12/79	Appendix C, Commitment 2	No change.	N	
(1) §4.2.2	Appendix C, Commitment 2, Alternative 1	Carried the alternative forward from what was approved through previous license amendments, 142 and 125 for North Anna, and 151 and 148 for Surry.	N	
(2) Bachelor's Degree	Appendix C, Commitment 2, Alternative 2	Minor wording changes, but the commitment statements are the same.	N	
(3) §4.4.5	Appendix C, Commitment 2, Alternative 3	Changed commitment to ANSI/ANS-3.1-1993 as endorsed by Reg. Guide 1.8, Rev. 3.	N	
(4) §4.3.2	Appendix C, Commitment 2, Alternative 4	Carried the Alternative forward from VEP-1-5A to DOM-QA-1. Alternative was previously approved by NRC.	N	
(5) §5.3.3	Appendix C, Commitment 2, Alternative 5	Carried the Alternative forward from VEP-1-5A to DOM-QA-1. Alternative was previously approved by NRC.	N	
(6) Requalification training	Appendix C, Commitment 2, Alternative 6	Carried the Alternative forward from VEP-1-5A to DOM-QA-1. Alternative was previously approved by NRC.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
	Appendix C, Commitment 3	DOM-QA-1 commits to a newer standard (ANS-3.1-1993) for selection, training, and qualification of personnel in support organizations and for Quality Control Inspection and Audit Supervision/Management. This standard has been approved by NRC Reg. Guide 1.8, Rev. 3. Specific Alternatives for this Reg. Guide and Standard are addressed below. This allows a common standard for these personnel who may support multiple facilities.	I	
	Appendix C, Commitment 3, Alternative 1	This alternative to Reg. Guide 1.8, Rev. 3, Regulatory Position paragraphs 2.1.1 and 2.1.3 allows the group's responsible executive (vice president) to approve equivalents to education and experience.	R	This alternative provides an equivalent level of approval, but assigns that responsibility to the executive responsible for the support group.
	Appendix C, Commitment 3, Alternative 2	This alternative to Reg. Guide 1.8, Rev. 3, Regulatory Position paragraphs 2.1.2, 2.3, 2.11, and 2.12 modifies the reference to the edition of NQA-1 from 1983 to 1994. This alternative is necessary to clearly identify the commitment documents and provides consistency throughout the QA program. Exelon SER (Ref. ML023440300) indicated that NQA-1-1994 was equivalent to NQA-1-1983.	N	
Reg. Guide 1.26, Rev. 3, 2/76	Appendix C, Commitment 4.	No substantive change from VEP-1-5A to DOM-QA-1. The alternative that indicates that the specific A, B, C, and D quality groups of the guide are not used is retained. This maintains consistency with the classification program presently in use at the sites.	N	
	Appendix C, Commitment 5	New commitment for North Anna and Surry. Reg. Guide 1.28, Rev. 3, endorses the use of NQA-1 and is fundamental to the consolidated QA program, DOM-QA-1.	I	
	Appendix C, Commitment 5, Alternative 1	Addresses the change from NQA-1-1983 as endorsed by the Reg. Guide to NQA-1-1994 based on NRC SER for Exelon's QA program (Ref. ML023440300).	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
	Appendix C, Commitment 5, Alternative 2	Includes the Guidance for external auditing will be used in the operations phase as well as design and construction phase. The guidance is consistent to what was available through the previous ANSI N45.2 daughter standards.	N	
	Appendix C, Commitment 6	Commitment to NQA-1-1994 as the principal QA Standard. Not a reduction in commitment based on NRC SER for Exelon's QA program (Ref. ML023440300).	N	
	Appendix C, Commitment 6, Alternative 1	Addresses need for additional definitions that are necessary to have a consistent program. The additional definitions are contained in DOM-QA-1, Appendix D.	N	
Reg. Guide 1.29, Rev. 3, 9/78	Appendix C, Commitment 7	Retains the commitment.	N	
Reg. Guide 1.30, 8/72	Appendix C, Commitment 6 NQA-1-1994, Subpart 2.4 (ANSI/IEEE Std. 336-85)	Updated commitment to the more recent ANSI Standard incorporated in NQA-1-1994.	R	Subpart 2.4 of NQA-1-1994 contains equivalent requirements to N45.2.4-72 with the Regulatory Position of Reg. Guide 1.30, 8/72. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
(1) Generic Statement of QATR (Clarification)		DOM-QA-1 applies these standards equally to construction and operations phase activities.	N	
(2) §2.1-Planning		Alternative not required under the change to NQA-1-1994.	N	
(3) §3-Preconstruction Verification		Clarification not required under the change to NQA-1-1994.	N	
(3) §4-Installation		Clarification not required under the change to NQA-1-1994.	N	
(3) §5.1-Inspection		Clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(3) §5.2-Tests		Clarification not required under the change to NQA-1-1994.	N	
(4) §6-Post-construction Verification		Clarification not required under the change to NQA-1-1994.	N	
(5) §6.2.1-Equipment Tests	Appendix C, Commitment 6, Item 8 (3)	Alternative carried forward to DOM-QA-1. It may not be practical to provide the described labels, therefore sufficient records will be maintained of the required information.	N	
(6) §7-Data Analysis and Evaluation		Clarification not required under the change to NQA-1-1994.	N	
Reg. Guide 1.33, Rev. 2, 2/78	Appendix C, Commitment 8	Commits to implement parts of Reg. Guide 1.33, 2/78. In lieu of a commitment to ANSI N18.7-76, the applicable parts of NQA-1-1994 will be used and augmented with additional administrative requirements as documented in DOM-QA-1.	R	Comparable administrative controls and QA requirements are established through the program. These are evaluated throughout Attachments 3 and 4 of the August 24, 2004 submittal of DOM-QA-1, Rev. 0.
(1) ¶C.3	Appendix B	Clarification not required under the change to NQA-1-1994.	N	
(2) ¶C.4	18.0 (All parts)	Clarification not required under the change to NQA-1-1994.	N	
(3) ¶C.5a		Clarification not required under the change to NQA-1-1994.	N	
(4) ¶C.5.d		Clarification not required under the change to NQA-1-1994.	N	
(5) ¶C.5.e		Clarification not required under the change to NQA-1-1994.	N	
(6) ¶C.5.f		Clarification not required under the change to NQA-1-1994.	N	
(7) ¶C.5.g		Clarification not required under the change to NQA-1-1994.	N	
(8) N18.7-76, §4.2		Clarification not required under the change to NQA-1-1994.	N	
(9) N18.7-76, §4.3		Clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(10) N18.7-76, §5.2.2		Clarification not required under the change to NQA-1-1994.	N	
(11) N18.7-76, §5.2.7		Clarification not required under the change to NQA-1-1994.	N	
(12) N18.7-76, §5.2.7.1		Clarification not required under the change to NQA-1-1994.	N	
(13) N18.7-76, §5.2.8		Clarification not required under the change to NQA-1-1994.	N	
(14) N18.7-76, §5.2.13.1		Clarification not required under the change to NQA-1-1994.	N	
(15) N18.7-76, §5.2.15		Clarification not required under the change to NQA-1-1994.	N	
(16) N18.7-76, §5.2.17		Clarification not required under the change to NQA-1-1994.	N	
(17) N18.7-76, §5.3.9		Clarification not required under the change to NQA-1-1994.	N	
(18) N18.7-76, §5.3.9.2		Clarification not required under the change to NQA-1-1994.	N	
(19) N18.7-76, §5.3.9.3		Clarification not required under the change to NQA-1-1994.	N	
	Appendix C, Commitment 9	Added conditional commitment to Reg. Guide 1.36, Rev 0, 2/73. Not a previous commitment for existing plants.	N	
Reg. Guide 1.37, 3/73	Appendix C, Commitment 6	NQA-1-1994, Subpart 2.1, replaces ANSI N45.2.1-1973.	R	Subpart 2.1 of NQA-1-1994 contains equivalent requirements to N45.2.1-1973 with the Regulatory Position of Reg. Guide 1.37, 3/73. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
(1) Application		Clarification not required under the change to NQA-1-1994.	N	
(2) ¶C.3		Clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(3) ¶C.4		Clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.1-1973§5		Clarification not required under the change to NQA-1-1994.	N	
Reg. Guide 1.38, Rev. 2, 5/77	Appendix C, Commitment 6	NQA-1-1994, Subpart 2.2, replaces ANSI N45.2.2-1972	R	Subpart 2.2 of NQA-1-1994 contains equivalent requirements to N45.2.2-1972 with the Regulatory Position of Reg. Guide 1.38, 5/77. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
(1) N45.2.2-1972 §2.1		Clarification not required under the change to NQA-1-1994.	N	
(2) N45.2.2-1972 §2.3		Clarification not required under the change to NQA-1-1994.	N	
(3) N45.2.2-1972 §2.7		Clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.2-1972 §3.2.1	Appendix C, Commitment 6, Alternative 6.(1)	Alternative retained. Previously approved by NRC letter dated 10/6/1982.	N	
(5) N45.2.2-1972 §3.2.3	Appendix C, Commitment 6, Alternative 6.(1)	Alternative retained. Previously approved by NRC letter dated 10/6/1982.	N	
(6) N45.2.2-1972 §3.3		Clarification not required under the change to NQA-1-1994.	N	
(7) N45.2.2-1972 §3.4	Appendix D	Retained clarifying definition of deleterious corrosion and included with other definitions.	N	
(8) N45.2.2-1972 §3.6		Clarification not required under the change to NQA-1-1994.	N	
(9) N45.2.2-1972 §3.7.1		Clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(10) N45.2.2-1972 §3.7.2		Clarification not required under the change to NQA-1-1994.	N	
(11) N45.2.2-1972 §§4.3, 4.4, 4.5		Clarification not required under the change to NQA-1-1994.	N	
(12) N45.2.2-1972 §5.2.1		Clarification not required under the change to NQA-1-1994.	N	
(13) N45.2.2-1972 §5.2.2		Clarification not required under the change to NQA-1-1994.	N	
(14) N45.2.2-1972 §5.4		Clarification not required under the change to NQA-1-1994.	N	
(15) N45.2.2-1972 §6.1.2		Clarification not required under the change to NQA-1-1994.	N	
(16) N45.2.2-1972 §6.2.1		Clarification not required under the change to NQA-1-1994.	N	
(17) N45.2.2-1972 §6.2.4		Clarification not required under the change to NQA-1-1994.	N	
(18) N45.2.2-1972 §6.2.5		Clarification not required under the change to NQA-1-1994.	N	
(19) N45.2.2-1972 §6.3.4		Clarification not required under the change to NQA-1-1994.	N	
(20) N45.2.2-1972 §6.4.2, items 5, 6, 7	Appendix C, Commitment 6, Alternative 6.(3)	Alternative retained. Previously approved by NRC letter dated 10/6/1982.	N	
(21) N45.2.2-1972 §6.5		Clarification not required under the change to NQA-1-1994.	N	
(22) N45.2.2-1972 §6.6	Appendix C, Commitment 6, Alternative 6.(4)	Retained clarification regarding records of access to storage areas.	N	
(23) N45.2.2-1972 §7.3		Clarification not required under the change to NQA-1-1994.	N	
(24) N45.2.2-1972 §A3.9	Appendix C, Commitment 6, Alternative 6.(2)	Retained clarification regarding marking of containers.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Reg. Guide 1.39, Rev. 2, 9/77	Appendix C, Commitment 6	NQA-1-1994, Subpart 2.3, replaces ANSI N45.2.3-1973.	R	Subpart 2.3 of NQA-1-1994 contains equivalent requirements to N45.2.3-1973 with the Regulatory Position of Reg. Guide 1.39, 9/77. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
(1) N45.2.3-1973 §2.1	Appendix C, Commitment 6, Alternative 7	Retains clarification regarding the use of the five-level zones.	N	
Reg. Guide 1.58, Rev. 1, 9/80	Appendix C, Commitments 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of the NQA-1 requirements for training and qualification of inspection personnel. Reg. Guide 1.58 has been withdrawn by the NRC. Refer to NQA-1-1994, Part I, Supplement 2S-1 and Part III, Appendix 2A-1 for program requirements.	N	
(1) N45.2.6-1978 §1.2		Clarification not required under the change to NQA-1-1994.	N	
(2) N45.2.6-1978 §1.4		Clarification not required under the change to NQA-1-1994.	N	
(3) N45.2.6-1978 §2.5		Clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.6-1978 §3.1		Clarification not required under the change to NQA-1-1994.	N	
Reg. Guide 1.64, Rev.2, 6/76	Appendix C, Commitments 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of NQA-1 requirements for Design Control. Reg. Guide 1.64 has been withdrawn by the NRC. Refer to NQA-1-1994, Part I, Basic and Supplemental requirements (3) related to Design Control for program requirements.	N	
Generic Statement of QATR		Clarification not required under the change to NQA-1-1994.	N	
(1) ¶C.2.(1)		Clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Reg. Guide 1.74, 2/74	Appendix C, Commitments 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of NQA-1 to replace N45.2.10 definitions.	R	The Introduction to Part I of NQA-1-1994 contains equivalent requirements to N45.2.10-1973 with the Regulatory Position of Reg. Guide 1.74, 2/74. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
(1) Define additional words or phrases		Clarification not required under the change to NQA-1-1994.	N	
(2) Inspection and Testing clarification		Clarification not required under the change to NQA-1-1994.	N	
(3) Procurement documents		Clarification not required under the change to NQA-1-1994.	N	
(4) Program deficiencies	Appendix D	Not defined in NQA-1-1994, therefore, retained a comparable definition.	N	
(5) Quality Assurance Program Requirements		Clarification not required under the change to NQA-1-1994.	N	
(6) Time intervals	Appendix D	Not defined in NQA-1-1994. Retained a definition that is comparable to those used in the Technical Specifications.	N	
Reg. Guide 1.88, Rev. 2, 10/76	Appendix C, Commitments 5 and 6	Reg. Guide 1.28, Rev. 3, addresses the use of NQA-1 requirements for control of records. The Reg. Guide also contains a table of records retention types and time periods. Reg. Guide 1.88 has been withdrawn by the NRC. Refer to NQA-1-1994, Part I, Basic and Supplemental requirements (17) for program requirements.	N	
(1) N45.2.9-1974 §3.2.2		Clarification not required under the change to NQA-1-1994.	N	
(2) N45.2.9-1974 §4.2		Clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(3) N45.2.9-1974 §5.4		Clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.9-1974 §5.5		Clarification not required under the change to NQA-1-1994.	N	
(5) N45.2.9-1974 §5.6		Clarification not required under the change to NQA-1-1994.	N	
(6) Surry Power Station facility		Alternative not required under the change to NQA-1-1994.	N	
(7) North Anna Power Station Records Vault		Alternative not required under the change to NQA-1-1994.	N	
(8) North Anna Power Station Training Center Vault		Alternative not required under the change to NQA-1-1994.	N	
(9) Innsbrook Technical Center's Vital Records Vault		Alternative not required under the change to NQA-1-1994.	N	
(10) Surry Training Center training records vault		Alternative not required under the change to NQA-1-1994.	N	
(11) QA records in offsite facility		Alternative not required under the change to NQA-1-1994.	N	
(12) N45.2.9-1974 §A.6		Clarification not required under the change to NQA-1-1994.	N	
(13) Electronically stored records	§17.3	Carried information from current QATR forward to DOM-QA-1.	N	
(14) N45.2.9-1974 §1.4		Clarification not required under the change to NQA-1-1994.	N	
(15) N45.2.9-1974 §2.2	Appendix D	Included clarifying definition in DOM-QA-1.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Reg. Guide 1.94, Rev. 1, 4/76	Appendix C, Commitment 6	NQA-1-1994, Subpart 2.5, replaces ANSI N45.2.5-1978 and includes the appropriate guidance of the Regulatory Position of Reg. Guide 1.94, 4/76.	R	Subpart 2.5 of NQA-1-1994 contains equivalent requirements to N45.2.5-1974 and N45.2.5-1978 with the Regulatory Position of Reg. Guide 1.94, 4/76. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
(1) N45.2.5-1974 §2.5.1		Clarification not required under the change to NQA-1-1994.	N	
(2) N45.2.5-1974 §4.9.1, ASME CC-4333.4 (1995 Edition)		Clarification not required under this change. This was information needed for a specific project (reactor vessel head replacement) that is completed.	N	
(3) N45.2.5-1974 §4.9.3, ASME CC-4333.5.2 (1995 Edition)		Clarification not required under this change. This was information needed for a specific project (reactor vessel head replacement) that is completed.	N	
(4) N45.2.5-1974 §4.9.4, ASME CC-4333.5.3 (1995 Edition)		Clarification not required under this change. This was information needed for a specific project (reactor vessel head replacement) that is completed.	N	
(5) N45.2.5-1974 §4.9.4, ASME CC-4333.5.2 ¶(4b) (1995 Edition)		Clarification not required under this change. This was information needed for a specific project (reactor vessel head replacement) that is completed.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Reg. Guide 1.116, Rev. 0-R, 6/76	Appendix C, Commitment 6	Clarification not required under this change. This was information needed for a specific project (reactor vessel head replacement) that is completed.	R	Subpart 2.8 of NQA-1-1994 contains equivalent requirements to N45.2.8-1975 with the Regulatory Position of Reg. Guide 1.116, 5/77. Reference Attachment 3 of the August 24, 2004 submittal for DOM-QA-1, Rev. 0. This Reg. Guide is not addressed as a commitment in NUREG-0800, SRP 17.3 that provides commitments to use in conjunction with a QA program based on NQA-1.
Reg. Guide 1.123, Rev. 1, 7/77	Appendix C, Commitment 6	NQA-1-1994, Part I, Basic and Supplemental requirements (4, 7, 8, 13) address the programmatic requirements previously contained in N45.2.131976. Reg. Guide 1.123 has been withdrawn by the NRC.	N	
(1) N45.2.13-1976 §1.3		Clarification not required under the change to NQA-1-1994.	N	
(2) N45.2.13-1976 §1.2.2		Clarification not required under the change to NQA-1-1994.	N	
(3) N45.2.13-1976 §3.1		Clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.13-1976 §3.4		Clarification not required under the change to NQA-1-1994.	N	
(5) N45.2.13-1976 §5.3		Clarification not required under the change to NQA-1-1994.	N	
(6) N45.2.13-1976 §6.4		Clarification not required under the change to NQA-1-1994.	N	
(7) N45.2.13-1976 §8.2		Clarification not required under the change to NQA-1-1994.	N	
Reg. Guide 1.144, Rev. 1, 9/80	Appendix C, Commitments 5 and 6	Reg. Guide 1.28, Rev. 3, addresses quality assurance auditing during design and construction phases. The guidance for external auditing will also be implemented during the operational phase. NQA-1-1994 establishes requirements for auditing that are comparable to those of N45.2.12-1977. Reg. Guide 1.144 has been withdrawn by the NRC.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(1) N45.2.12-1977 §1.4		This specific clarification not required under the change to NQA-1-1994.	N	
(2) N45.2.12-1977 §2.2		This specific clarification not required under the change to NQA-1-1994.	N	
(3) N45.2.12-1977 §2.3		This specific clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.12-1977 §2.4		This specific clarification not required under the change to NQA-1-1994.	N	
(5) N45.2.12-1977 §3.3		This specific clarification not required under the change to NQA-1-1994.	N	
(6) N45.2.12-1977 §3.5		This specific clarification not required under the change to NQA-1-1994.	N	
(7) N45.2.12-1977 §4.3.1		This specific clarification not required under the change to NQA-1-1994.	N	
(8)(a) N45.2.12-1977 §4.3.2		This specific clarification not required under the change to NQA-1-1994.	N	
(8)(b) N45.2.12-1977 §4.3.4		This specific clarification not required under the change to NQA-1-1994.	N	
(8)(c) N45.2.12-1977 §4.3.2.5		This specific clarification not required under the change to NQA-1-1994.	N	
(9) N45.2.12-1977 §4.3.3		This specific clarification not required under the change to NQA-1-1994.	N	
(10)(a) N45.2.12-1977 §4.4		This specific clarification not required under the change to NQA-1-1994.	N	
(10)(b) N45.2.12-1977 §4.4.3		This specific clarification not required under the change to NQA-1-1994.	N	
(10)(c) N45.2.12-1977 §4.4.6		This specific clarification not required under the change to NQA-1-1994.	N	
(11) N45.2.12-1977 §4.5.1		This specific clarification not required under the change to NQA-1-1994.	N	
Reg. Guide 1.146, Rev. 0, 8/80	Appendix C, Commitment 6	NQA-1-1994 addresses comparable requirements for qualification of quality assurance auditors in Supplemental Requirements 2S-3. Reg. Guide 1.28 has been withdrawn by the NRC.	N	
(1) N45.2.23-1978 §1.4		This specific clarification not required under the change to NQA-1-1994.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
(2) N45.2.23-1978 §2.2		This specific clarification not required under the change to NQA-1-1994.	N	
(3) N45.2.23-1978 §2.3		This specific clarification not required under the change to NQA-1-1994.	N	
(4) N45.2.23-1978 §3.2		This specific clarification not required under the change to NQA-1-1994.	N	
(5) N45.2.23-1978 §4.1		This specific clarification not required under the change to NQA-1-1994.	N	
(6) N45.2.23-1978 §5.3		This specific clarification not required under the change to NQA-1-1994.	N	
	Appendix C, Commitment 6	Adds a commitment to implement the requirements of Subpart 2.15 to NQA-1-1994 with one alternative. This subpart addresses hoisting, rigging, and transporting. ANSI N45.2.2-1972 only included a small part of the information in this subpart. Use of this standard includes one alternative regarding not using the specific designations of Category A, B, or C when determining the controls to apply to the lift. The alternative is acceptable in that items will be reviewed against the requirements to establish the minimum controls to be implemented, but may not specifically use these category designations. This maintains consistency with the existing programs.	I	
	Appendix C, Commitment 6	Adds a commitment to implement the requirements of Subpart 2.16 to NQA-1-1994 regarding measuring and test equipment with two alternatives. (1) Changes references to NQA-1-1994 and the QAPD for consistency throughout the QA program. (2) Addresses the use of records in lieu of labeling for installed equipment. This alternative is necessary because it is not practical to include all the required information on labels affixed to the installed devices. Each item is identified with a unique number and the records, traceable to that number, will provide an equivalent level of information.	I	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
	Appendix C, Commitment 6	Adds a commitment to implement the requirements of Subpart 2.18 to NQA-1-1994 for maintenance, with two alternatives. (1) Changes reference to ANS-3.2 to the QAPD to maintain consistency throughout the QA program. (2) Makes the requirement to have the description of work reference the applicable maintenance procedures to a recommendation. Although this is generally the practice, it is recognized that the responsibility for ensuring the correct procedures are used for the activities rests with the maintenance supervisor and lead technician for the work.	I	
	Appendix C, Commitment 6	Adds a commitment to implement the requirements of Subpart 2.20 to NQA-1-1994 for Subsurface Investigations for the construction of a nuclear plant. This would apply to new construction.	I	
	Appendix C, Commitment 11	Added commitment to Reg. Guide 1.152, Jan. 1996 with an alternative to replace references to ASME NQA-1 and ASME NQA-2 with NQA-1-1994. This alternative is acceptable because it provides consistency with the remainder of the QAPD.	N	
	Appendix C, Commitment 10	Added conditional commitment to Reg. Guide 1.36, Rev 0, 2/73. Not a previous commitment for existing plants.	I	
	Appendix C, Commitment 12	Added conditional commitment to Reg. Guide 1.143, Rev. 2, 11/01, since the commitment was site specific. The applicable requirements will be used for plant modifications on a case-by-case basis.	N	
	Appendix C, Commitment 13	Added commitment to Reg. Guide 4.15, Rev. 1, 2/79 that was previously addressed in licensing basis documents.	N	
	Appendix C, Commitment 14	Added commitment to Reg. Guide 7.10, Rev. 1, 6/86 that was previously addressed in licensing basis documents.	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
	Appendix C, Commitment 15	Added commitment to GL 89-02 and EPRI-NP-5652 that was previously addressed in licensing basis documents. The Company commits to use the endorsed industry guidance regarding the selection and qualification of commercial grade Suppliers and for the dedication of commercial grade items used in applications important to safety.	N	
	Appendix C, Commitment 16	Added commitment to BTP ASB/CMEB 9.5-1. 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.	N	
Table 17.2-1 – Relationship to Appendix B	Introduction ¶3	Table not used, relationship described in text.	N	
Table 17.2-2 - Records	Appendix E	A similar table is used to address additional operations phase records that may not be addressed in the table included as part of Reg. Guide 1.28, Rev. 3.	N	
Appendix C – North Anna Nuclear Safety Review	Appendix B	Reformatted and reworded to address MSRC, SNSOC (SORC), and SNS review requirements for all sites, not just limited to North Anna. Relocated Audit program requirements to Section 18 of DOM-QA-1, but retains MSRC review of audit program/results.	N	
Section A – MSRC	Appendix B, §§1, 2, and 3	No longer requires MSRC to complete a review of Technical Specification or license amendments prior to submittal to NRC, however, the facility safety review committee will be required to perform this review prior to submittal to the NRC. This is consistent with the requirements of ANSI N18.7-1976 and at least one review group will be performing the review prior to NRC submittal. This meets the intent of Reg. Guide 1.33, Regulatory Position C.3, that states that these changes "should be reviewed by the independent review body prior to their submittal to the Commission for approval."	N	

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VEP-1-5A Section or Paragraph	DOM-QA-1 Section or Paragraph	Change	R/N/I *	Basis for Reduction in Commitment continuing to meet 10 CFR 50, Appendix B
Section B – SNSOC	Appendix B, §§1, 2, and 4	Modifies procedure review requirements to be consistent between sites and maintains consistency with those established in ANSI N18.7-1976 to ensure that procedures that reflect a change license requirements or operation of the facility as described in the SAR are reviewed by the appropriate facility safety committee.	N	
Section C – SNS	Appendix B, §§1, 2, 5	Modifies review requirements to be consistent between sites and satisfy any applicable facility commitments based on the ISEG requirements of NUREG-0737. Minimum number of full-time engineers reduced to four members-Submitted in Revision 25 to MPS QAPTR (Based on NRC SER to Perry Nuclear, dated September 16, 1998, TAC MA3325.)	N	

NOTE 1: Commitments remain the same, wording changes made to reflect a consistent format and level of detail for Dominion fleet operations.
NOTE 2: Changed site specific titles to generic title descriptions and depicts reporting relationships through organization charts.

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