September 9, 2005

Mr. David A. Christian
Sr. Vice President and Chief Nuclear Officer
Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: APPROVAL OF DOMINION NUCLEAR CONNECTICUT AND VIRGINIA ELECTRIC AND POWER COMPANY QUALITY ASSURANCE PROGRAM DESCRIPTION TOPICAL REPORT FOR MILLSTONE POWER STATION, UNIT NOS. 1, 2 AND 3, NORTH ANNA POWER STATION UNIT NOS. 1 AND 2, AND SURRY POWER STATION, UNIT NOS. 1 AND 2 (TAC NOS. MC4414, MC4415, MC4416, MC4417, MC4418, MC4419, AND MC4420)

Dear Mr. Christian:

By letter dated August 24, 2004, as supplemented by letter dated May 5, 2005, Dominion Nuclear Connecticut, Inc. and Virginia Electric and Power Company (the licensees) submitted their Nuclear Facilities Quality Assurance Program Description (NFQAPD) Topical Report (DOM-QA-1) for review and approval by the Nuclear Regulatory Commission (NRC) staff in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(a)(4), Part 71 Subpart H, and Part 72 Subpart G

In their submittal, the licensees proposed to replace and consolidate the site-specific quality assurance programs for Millstone Power Station, Unit Nos. 1, 2, and 3 (MPS1, 2 and 3), Surry Power Station, Unit Nos. 1 and 2 (SPS1 and 2), and North Anna Power Station, Units 1 and 2 (NAS1 and 2), into a common Quality Assurance (QA) program. The new NFQAPD is based on 10 CFR Part 50, Appendix B and American Society of Mechanical Engineers (ASME) NQA-1-1994.

The enclosed Safety Evaluation (SE) documents the basis for the NRC staff's conclusion that the proposed consolidation of the QA programs for MPS1, 2, and 3, SPS1 and 2, and NAS1 and 2, into a common QA program, as revised by the referenced supplemental letter, meets the criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

In accordance with the guidance provided on the NRC website, the NRC requests that the licensees publish an accepted version of this topical report within three months of receipt of this letter. The accepted version shall incorporate this letter and the enclosed SE between the title page and the abstract. It must be well indexed such that information is readily located. Also, it must contain, in appendices, historical review information, such as questions and accepted responses, and original report pages that were replaced. The accepted version shall include an "-A" (designated accepted) following the report identification symbol.

If the NRC's criteria or regulations change such that its conclusions as to the acceptability of the topical report are invalidated, then the licensees will be expected to revise and resubmit its respective documentation, or submit justification for the continued applicability of the topical report without revision of the respective documentation.

If there are any further questions, please contact Victor Nerses, at (301) 415-1484 or vxn@nrc.gov.

Sincerely,

/RA/

Cornelius F. Holden, Project Director
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336, 50-423, 50-338, 50-339, 50-280, and 50-281

Enclosure: As stated

cc w/encl: See next pages

If the NRC's criteria or regulations change such that its conclusions as to the acceptability of the topical report are invalidated, then the licensees will be expected to revise and resubmit its respective documentation, or submit justification for the continued applicability of the topical report without revision of the respective documentation.

If there are any further questions, please contact Victor Nerses, at (301) 415-1484 or vxn@nrc.gov.

Sincerely,

/RA/

Cornelius F. Holden, Project Director
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336, 50-423, 50-338, 50-339, 50-280, and 50-281

Enclosure: As stated

cc w/encl: See next pages

DISTRIBUTION:

PUBLIC	AWang	GMatakas,RGN-1	DRoberts
PDI-2 Reading	CRaynor	DThatcher	RLewis
ACRS	OGC	GHill (7)	SMonarque
JPearson	KKavanagh	CHolden	

ADAMS Accession Number: ML052490337

OFFICE	PDI-2/PM	PDI-2/LA	PD2-1/PM	PD4-2/PM	SFPO/TSSI/ SC(A)	IPSB/SC	PDI-2/SC	PDI/D
NAME	VNerses	CRaynor	SMonarque	AWang	JPeralta	DThatcher	DRoberts	CHolden
DATE	9/07/05	9/07/05	08/17/05	08/22/05	08/22/05	7/11/05	09/06/05	9/09/05

OFFICIAL RECORD COPY

cc:
Lillian M. Cuoco, Esquire
Senior Counsel
Dominion Resources Services, Inc.
Rope Ferry Road
Waterford, CT 06385

Edward L. Wilds, Jr., Ph.D.
Director, Division of Radiation
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Mr. Allan Johanson, Assistant Director
Office of Policy and Management
Policy Development & Planning Division
450 Capitol Avenue - MS# 52ERN
P.O. Box 341441
Hartford, CT 06134-1441

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

First Selectmen
Town of Waterford
15 Rope Ferry Road
Waterford, CT 06385

Attorney Nicholas J. Scobbo, Jr.
Ferriter, Scobbo, & Rodophele, PC
125 High Street
Boston, MA 02110

Ernest C. Hadley, Esquire
1040 B Main Street
P.O. Box 549
West Wareham, MA 02576

Mr. Evan W. Woollacott, Co-Chair
Nuclear Energy Advisory Council
128 Terry's Plain Road
Simsbury, CT 06070

Citizens Regulatory Commission
ATTN: Ms. Susan Perry Luxton
180 Great Neck Road
Waterford, CT 06385

Deborah Katz, President
Citizens Awareness Network
P.O. Box 83
Shelburne Falls, MA 03170

Mr. John Buckingham
Department of Public Utility Control
Electric Unit
10 Liberty Square
New Britain, CT 06051

Nancy Burton, Esquire
147 Cross Highway
Redding Ridge, CT 06876

Mr. W. R. Matthews
Senior Vice President - Nuclear Operations
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. P. J. Parulis
Manager - Nuclear Oversight
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. S. E. Scace
Assistant to the Site Vice President
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. J. Alan Price
Site Vice President - Millstone
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

cc:
Mr. G. D. Hicks, Director
Nuclear Station Safety and Licensing
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. A. J. Jordan, Jr.
Director - Nuclear Engineering
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. S. P. Sarver, Director
Nuclear Station Operations & Maintenance
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. Chris L. Funderburk
Director, Nuclear Licensing and
Operations Support
Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Mr. David W. Dodson
Licensing Supervisor
Dominion Nuclear Connecticut , Inc.
Rope Ferry Road
Waterford, Connecticut 06385

Millstone Power Station, Unit Nos. 2 and 3

cc:

Lillian M. Cuoco, Esquire
Senior Counsel
Dominion Resources Services, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Edward L. Wilds, Jr., Ph.D.
Director, Division of Radiation
Department of Environmental
Protection
79 Elm Street
Hartford, CT 06106-5127

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

First Selectmen
Town of Waterford
15 Rope Ferry Road
Waterford, CT 06385

Charles Brinkman, Director
Washington Operations Nuclear Services
Westinghouse Electric Company
12300 Twinbrook Pkwy, Suite 330
Rockville, MD 20852

Senior Resident Inspector
Millstone Power Station
c/o U.S. Nuclear Regulatory Commission
P. O. Box 513
Niantic, CT 06357

Mr. John Markowicz
Co-Chair
Nuclear Energy Advisory Council
9 Susan Terrace
Waterford, CT 06385

Ms. Nancy Burton
147 Cross Highway
Redding Ridge, CT 00870

Mr. Evan W. Woollacott
Co-Chair
Nuclear Energy Advisory Council
128 Terry's Plain Road
Simsbury, CT 06070

Mr. Joseph Roy
Director of Operations
Massachusetts Municipal Wholesale
Electric Company
P.O. Box 426
Ludlow, MA 01056

Mr. David W. Dodson
Licensing Supervisor
Dominion Nuclear Connecticut, Inc.
Building 475, 5th Floor
Roper Ferry Road
Waterford, CT 06385

Mr. J. Alan Price
Site Vice President
Dominion Nuclear Connecticut, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Mr. Chris L. Funderburk
Director, Nuclear Licensing and
Operations Support
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

North Anna Power Station, Units 1 & 2

cc:

Mr. C. Lee Lintecum
County Administrator
Louisa County
Post Office Box 160
Louisa, Virginia 23093

Ms. Lillian M. Cuoco, Esq.
Senior Counsel
Dominion Resources Services, Inc.
Building 475, 5th floor
Rope Ferry Road
Waterford, Connecticut 06385

Dr. W. T. Lough
Virginia State Corporation Commission
Division of Energy Regulation
Post Office Box 1197
Richmond, Virginia 23218

Old Dominion Electric Cooperative
4201 Dominion Blvd.
Glen Allen, Virginia 23060

Mr. Chris L. Funderburk, Director
Nuclear Licensing & Operations Support
Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Senior Resident Inspector
North Anna Power Station
U. S. Nuclear Regulatory Commission
1024 Haley Drive
Mineral, Virginia 23117

Mr. Jack M. Davis
Site Vice President
North Anna Power Station
Virginia Electric and Power Company
Post Office Box 402
Mineral, Virginia 23117-0402

Dr. Robert B. Stroube, MD, MPH
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
Post Office Box 2448
Richmond, Virginia 23218

Surry Power Station, Units 1 & 2

cc:

Ms. Lillian M. Cuoco, Esq.
Senior Counsel
Dominion Resources Services, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, Connecticut 06385

Mr. Donald E. Jernigan
Site Vice President
Surry Power Station
Virginia Electric and Power Company
5570 Hog Island Road
Surry, Virginia 23883-0315

Senior Resident Inspector
Surry Power Station
U. S. Nuclear Regulatory Commission
5850 Hog Island Road
Surry, Virginia 23883

Chairman
Board of Supervisors of Surry County
Surry County Courthouse
Surry, Virginia 23683

Dr. W. T. Lough
Virginia State Corporation Commission
Division of Energy Regulation
Post Office Box 1197
Richmond, Virginia 23218

Dr. Robert B. Stroube, MD, MPH
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
Post Office Box 2448
Richmond, Virginia 23218

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Mr. Chris L. Funderburk, Director
Nuclear Licensing & Operations Support
Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

SAFETY EVALUATION OF PROPOSED CHANGE

TO THE QUALITY ASSURANCE PROGRAM

QUALITY ASSURANCE PROGRAM CONSOLIDATION

MILLSTONE POWER STATION, UNIT NOS. 1, 2 AND 3

NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2

SURRY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-245, 50-336, 50-423, 50-338, 50-339, 50-280, AND 50-281

1.0 INTRODUCTION

By letter dated August 24, 2004 (Reference 1), as supplemented by letter dated May 5, 2005 (Reference 2), Dominion Nuclear Connecticut, Inc. and Virginia Electric and Power Company (the licensees) submitted a revision to the respective stations' quality assurance (QA) program. In their submittal, the licensees have proposed to replace and consolidate the QA programs for Millstone Power Station, Unit Nos. 1, 2, and 3 (MPS1, 2 and 3), Surry Power Station, Unit Nos. 1 and 2 (SPS1 and 2), and North Anna Power Station, Unit Nos. 1 and 2 (NAS1 and 2), into a common QA program.

2.0 BACKGROUND

The licensees accomplished the consolidation through their new Nuclear Facilities Quality Assurance Program Description (NFQAPD) Topical Report (DOM-QA-1) that was submitted by the August 24, 2004 letter (as Attachment 1) for Nuclear Regulatory Commission (NRC or the Commission) review and approval in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(a)(4), Part 71 Subpart H, and Part 72 Subpart G. The to-be-replaced site-specific QA programs for NAS1 and 2, SPS1 and 2 and MPS1, 2 and 3 were included as Attachments 5 and 6, respectively, of the licensees' August 24, 2004 submittal.

The letter dated May 5, 2005 provided additional information in support of and revisions to the NFQAPD submitted as Attachment 1 of the original submittal. The QA program described in the NFQAPD commits to the guidance of the American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA) standard NQA-1-1994, "Quality Assurance Requirements for Nuclear Applications." NQA-1-1994, Part I sets forth programmatic requirements for the establishment and execution of QA programs for the siting, design, construction, operation, and decommissioning of nuclear facilities. NQA-1-1994, Part II sets forth non-programmatic QA requirements for the planning and execution of identified tasks during the fabrication, construction, modification, repair, maintenance, and testing of structures,

systems and components (SSCs) for nuclear facilities. The guidance of Parts I and II of NQA-1-1994 is similar to that provided by American National Standards Institute (ANSI) N45.2 standards developed in the 1970s and early 1980s. The licensees propose to adopt NQA-1-1994 in lieu of certain current commitments to N45.2 standards.

The NRC staff has previously approved the use of NQA-1-1994, as supplemented by the guidance of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," for nuclear operating facilities (References 3 and 4). The most notable changes incorporated into the NFQAPD include: 1) a commitment to ANSI/ASME NQA-1-1994 as the basic QA standard as a replacement for the previous ANSI N45.2 series of standards; 2) a commitment to establish and implement administrative controls and QA requirements within the NFQAPD for the operating phase activities that are consistent with the guidance of Regulatory Guide (RG) 1.33 rather than through a specific commitment to ANSI N18.7-1976/American Nuclear Society (ANS) 3.2; 3) the use of generic management position 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; 4) the use of generic functional descriptions of the organization rather than specific titles and the use of organization charts to depict the reporting relationships; and 5) the use of alternative methods from those described in NQA-1-1994 to ensure the requirements of 10 CFR Part 50 Appendix B are satisfactorily implemented.

3.0 REGULATORY EVALUATION

The Commission's regulatory requirements related to QA programs are set forth in 10 CFR Part 50 Appendix B; 10 CFR 50.34(b)(6)(ii), "Contents of applications; technical information;" 10 CFR 50.54(a), "Conditions for licenses;" 10 CFR Part 71, "PACKAGING AND TRANSPORTATION OF RADIOACTIVE MATERIAL," Subpart H, "Quality Assurance;" and 10 CFR Part 72, "LICENSING REQUIREMENTS FOR THE INDEPENDENT STORAGE OF SPENT NUCLEAR FUEL, HIGH-LEVEL RADIOACTIVE WASTE, AND REACTOR-RELATED GREATER THAN CLASS C WASTE", Subpart G, "Quality Assurance".

RG 7.10, Revision 1, "Establishing Quality Assurance Programs for Packaging used in the Transport of Radioactive Materials Packaging" and NUREG-1567, "Standard Review Plan for Spent Fuel Dry Storage Facilities" were used as guidance during the NRC staff's review of the licensees' proposed revision .

Part 50 of 10 CFR Appendix B establishes QA requirements for the design, construction, and operation of SSCs of the facility. The pertinent requirements of Appendix B apply to all activities affecting the safety-related functions of those SSCs and include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying. Also, the NRC staff considers that the requirements of Appendix B are acceptable for meeting the requirements of Part 71 Subpart H, and Part 72 Subpart G and, therefore, formed the basis that the NRC staff used to evaluate and accept the licensees' proposed revision to their QA program. Notwithstanding the fact that the requirements of Appendix B were used as the main basis for program acceptance, the NRC staff, as an adjunct to the evaluation done against the Appendix B requirements, performed an assessment of the licensees' NFQAPD against the requirements under 10 CFR Part 71 Subpart H, and 10 CFR Part 72 Subpart G.

Section 50.34 of 10 CFR requires that every applicant for an operating license include in its final safety analysis report (FSAR) information on managerial and administrative controls to be used to assure safe operation. The information on the controls shall also include a discussion of how the applicable requirements of Appendix B will be satisfied. Section 50.54(a) of 10 CFR states that licensees may make a change to a previously accepted QA program description included or referenced in the FSAR without prior NRC approval, provided the change does not reduce the commitments in the program description as accepted by the NRC. Changes to the QA program description that do reduce the commitments must be submitted to the NRC and receive NRC approval prior to implementation.

4.0 EVALUATION

In evaluating the adequacy of the format and level of detail of the revised QA program description, the NRC staff followed the guidance of the Standard Review Plan (SRP) (NUREG-0800), Chapter 17.3, "Quality Assurance Program Description." SRP 17.3 provides an outline of a standardized QA program for construction permit holders, their principal contractors, and operating facility licensees. In their submittal, the licensees stated that the existing licensees' facilities were all based on QA programs written to the structure of SRP 17.1 and 17.2, which follow the specific outline of 10 CFR 50 Appendix B. However, since SRP 17.3 was developed on the basis of a program that follows NQA-1-1994, the licensees used SRP 17.3 to determine the appropriate regulatory guidance that applies to the proposed NFQAPD as well as providing other useful insight into QA program requirements.

The NRC staff's review concentrated on three specific aspects of the licensees' proposed change and consolidation of the QA program description for MPS1, 2 and 3, NAS1 and 2, and SPS1 and 2. These aspects included the proposed program format, attributes and level of detail (SRP 17.3), changes in regulatory commitments, and the basis for the change from ANSI N45.2 to NQA-1-1994.

4.1 Acceptability of the QA Program Description

4.1.1 Organization

The NFQAPD is the top-level policy document that establishes the quality policy and assigns major functional responsibilities for the licensees' facilities. The licensees are committed to establishing and maintaining an organization in accordance with the quality standards described in NQA-1-1994, Basic Requirement 1 and Supplement 1S-1. The organization consists of three main parts: corporate management, support organizations, and facility operations. The Chief Nuclear Officer (CNO) is responsible for overall corporate policy and implementation of the QA program. The organizational relationships of key management and functional groups for corporate and technical support are identified in Appendix A of the NFQAPD. Reporting to the CNO are executive managers responsible for nuclear operations, engineering services, and support services via staff at both the corporate and site levels. The executive manager of nuclear operations is responsible for overall operating activities of the licensees' nuclear facilities. The executive manager of engineering services is responsible for the engineering functions supporting design and construction activities and long-term nuclear operations. The executive manager of support services is responsible for direction and support of information technology for the nuclear organizations and facilities. In all cases, the executive managers

retain responsibility for the scope and effective implementation of the QA program for their function responsibilities.

The licensees' site organizations are directed by an executive manager for facility operations. Each executive manager for facility operations reports to the executive manager for nuclear operations, who reports to the CNO. This position is responsible for station compliance with the NRC operating license, governmental regulations, and ASME Boiler and Pressure Vessel Code (Code) requirements, if applicable, and provides day-to-day direction and management of plant operations activities. The site reporting structure and management positions responsible for plant operations, training, business support, engineering, regulatory affairs, performance assessment, and nuclear oversight are identified in Appendix A of the NFQAPD. Responsibility and authority for executing an effective overall QA program and delegation of program responsibilities are clearly described and defined.

4.1.2 QA Program

The licensees have established a QA program for the nuclear power stations and independent spent fuel storage installations. The QA program accomplishes two objectives: provide orderly, uniform administrative and managerial documents to assure safe and reliable operation of nuclear facilities, and assure compliance with regulations promulgated by the NRC. Provisions for establishing and maintaining formal indoctrination and training programs for personnel performing, verifying or managing activities within the scope of the NFQAPD are described in the QA program. In establishing qualification and training programs, the licensees commit to implementing the QA program in accordance with the quality standards described in NQA-1-1994, Basic Requirement 2 and its associated Supplements, and Appendix 2A-1 (Part III of NQA-1-1994), including alternatives described in Section 4.3 of this Safety Evaluation (SE). The licensees' staff qualifications for positions within the scope of 10 CFR 50.120 are delineated in plant technical specifications. The licensees' staff training for positions identified in 10 CFR 50.120 is accomplished according to programs accredited by the National Nuclear Accrediting Board of the National Academy for Nuclear Training.

4.1.3 Design Control

The licensees have established and implemented administrative controls to assure quality is achieved in establishing and changing the design for the nuclear facilities in accordance with industry standards and regulatory requirements. The licensees' design control program includes provisions to control design inputs, processes, outputs, changes, interfaces, records, and organizational interfaces. In establishing its program for design control, the licensees commit to meeting the standards of NQA-1-1994, Basic Requirement 3, Supplement 3S-1, and the standards for computer software contained in Subpart 2.7.

4.1.4 Procurement Document Control

The licensees have established and implemented administrative controls and processes to assure that applicable regulatory, technical, and QA program requirements are included or

referenced in procurement documents. The licensees commit to meeting the QA standards for procurement document control of NQA-1-1994, Basic Requirement 4 and Supplement 4S-1.

4.1.5 Instructions, Procedures, and Drawings

The licensees have established and implemented administrative controls to assure that activities affecting quality are prescribed by, and performed in accordance with, documented instructions, procedures, and drawings. Types of procedures and instructions to be developed and used, according to the phase that a facility is in, as well as the type of the facility and activities conducted, are described. The licensees commit to meeting the QA standards for instructions, procedures, and drawings of NQA-1-1994, Basic Requirement 5. The licensees also commit to implement additional requirements regarding the content of procedures for specific activities delineated in NQA-1-1994, Part II, as appropriate to the activity.

4.1.6 Document Control

The licensees have established and implemented administrative controls to assure the review, approval, and issuance of controlled documents. Measures are provided to assure that documents, including revisions or changes, are reviewed for adequacy by independent knowledgeable personnel (other than those who originated or prepared the document), approved for release by authorized personnel, and distributed in accordance with current approved methods. In establishing provisions for document control, the licensees commit to meeting the QA standards for document control of NQA-1-1994, Basic Requirement 6 and Supplement 6S-1.

4.1.7 Control of Purchased Material, Equipment, and Services

The licensees have established and implemented programs, procedures, and processes for the control of purchased items and services, selection of suppliers, and assessing the acceptability of quality. Purchased items (components, spare and replacement parts necessary for plant operation, refueling, maintenance and modifications) and services are subject to quality and technical requirements at least equivalent to those specified for original equipment or specified by properly reviewed and approved revisions to assure the items are suitable for the intended service, and are of acceptable quality, consistent with their effect on safety. The licensees commit to meeting the QA standards for control of purchased material, equipment, and services contained in NQA-1-1994, Basic Requirement 7, and Supplement 7S-1, with the exception described in Section 4.3 of this SE.

4.1.8 Identification and Control of Materials, Parts, and Components

The licensees have established and implemented administrative controls and processes for the identification and control of items such as materials (including consumables), parts, components, and partially fabricated subassemblies. Methods used for identification of items assure traceability of the items to the appropriate documentation such as drawings, specifications, purchase orders, manufacturing and inspection documents, problem reports, and physical and chemical mill test reports. The licensees commit to meeting the QA standards for identification and control of items contained in NQA-1-1994, Basic Requirement 8 and Supplement 8S-1.

4.1.9 Control of Special Processes

The licensees have established and implemented programs, procedures, and processes to assure the acceptability of special processes through the use of procedures, technique sheets, travelers and inspection verification reports, and personnel qualified in accordance with the applicable codes, specifications, and standards of the specific work. The licensees commit to meeting the QA standards for control of special processes from NQA-1-1994, Basic Requirement 9 and Supplement 9S-1.

4.1.10 Inspection

The licensees have established and implemented administrative controls and processes to inspect activities for the nuclear facilities that affect quality to verify conformance with the approved documents for accomplishing the activities, including specifications and quality standards. The licensees commit to meeting the programmatic standards for inspection of NQA-1-1994, Basic Requirement 10, and Supplement 10S-1, with the alternative described in Section 4.1 of this SE. The licensees also commit to incorporate into the inspection program the appropriate inspection requirements described in NQA-1-1994, Part II, as appropriate to the activity.

4.1.11 Test Control

The licensees have established and implemented programs, procedures, and processes to control tests that assure the nuclear facility structures, systems, and components (items) function satisfactorily in service. The licensees commit to meeting the programmatic standards for test control of NQA-1-1994, Basic Requirement 11, and Supplements 11S-1 and 11S-2. The licensees also commit to incorporate the appropriate surveillance and testing requirements described in NQA-1-1994, Part II.

4.1.12 Control of Measuring and Test Equipment

The licensees have established and implemented administrative controls and processes for the calibration, maintenance, and use of measuring and test equipment (including instruments, tools, gauges, fixtures, reference and transfer standards, and non-destructive test equipment). The licensees commit to meeting the standards for control of measuring and test equipment of NQA-1-1994, Basic Requirement 12, Supplement 12S-1, and Subpart 2.16, with the alternatives described in Section 4.2 of this SE.

4.1.13 Handling, Storage, and Shipping

The licensees have established and implemented programs, procedures, and processes to control handling, storage, shipping, cleaning, packaging, and preservation of items. The licensees commit to meeting the standards for handling, storage, and shipping of NQA-1-1994, Basic Requirement 13, Supplement 13S-1, and Subparts 2.2 and 2.15, with the alternatives described in Section 13.3 of the NFQAPD.

4.1.14 Inspection, Test, and Operating Status

The licensees have established and implemented administrative controls and processes to indicate and document the inspection, test, and operating status of SSCs to prevent their inadvertent use or the bypassing of inspections and tests. The licensees commit to implementing an audit program in accordance with the quality standards described in NQA-1-1994, Basic Requirement 14.

4.1.15 Nonconforming Materials, Parts, or Components

The licensees have established and implemented administrative controls and processes that assure control of nonconforming items (materials, parts, components), and services (including computer codes) to prevent their inadvertent use or installation in the licensees' nuclear facilities. Nuclear oversight processes verify that nonconformance dispositions are adequate, analyze for quality trends, and report results to upper management in accordance with applicable procedures. The licensees commit to meeting the standards for control of nonconforming items of NQA-1-1994, Basic Requirement 15 and Supplement 15S-1.

4.1.16 Corrective Action

The licensees have established and implemented corrective active programs, procedures, and processes to assure that conditions adverse to quality at the licensees' nuclear facilities are promptly identified and corrected. The licensees' corrective action procedures describe the methods for follow-up action to verify proper implementation of corrective action and ensure that corrective actions are closed out in a timely manner, and include follow-up through nuclear oversight processes. The licensees commit to meeting the standards for corrective action of NQA-1-1994, Basic Requirement 16.

4.1.17 QA Records

The licensees have established and implemented administrative controls and processes to ensure sufficient records of items and activities for the nuclear facilities that reflect completed work are generated, identified, retained, maintained, and retrievable. Records stored electronically will follow the guidance given in the Nuclear Information and Records Management Association (NIRMA) technical guidance, TG-15-1998, "Management of Electronic Records." The licensees are committed to implementing a QA records program in accordance with the quality standards of NQA-1-1994, Basic Requirement 17 and Supplement 17S-1. The licensees will also meet Regulatory Position C.2 of RG 1.28, Revision 3, regarding the retention of QA records.

4.1.18 QA Audits

The licensees have established and implemented administrative controls and processes for audits to systematically verify compliance with, and determine the effectiveness of, all aspects of the QA program for nuclear facilities. The licensees' documents ensure that triennial external audits, annual supplier QA program evaluations, reviews of audits conducted by external organizations (e.g., other utilities and the Nuclear Procurement Issues Committee), and maintenance of the approved supplies list which are performed to assure suppliers' QA

programs meet applicable requirements and that only qualified suppliers are used. Internal audits include verification of compliance and effectiveness of the administrative controls established for implementing the requirements of the NFQAPD; regulations and license provisions; provisions for training, retraining, qualification, and performance of personnel performing activities covered by the NFQAPD; corrective actions taken following abnormal occurrences; and observation of the performance of construction, fabrication, operating, refueling, maintenance, modification, and decommissioning activities. The licensees are committed to implementing an audit program in accordance with the quality standards described in NQA-1-1994, Basic Requirement 18 and Supplement 18S-1.

Based on the NRC staff's review, the NRC staff concludes that the NFQAPD adequately describes the licensees' QA program.

4.2 Changes to Current QA Commitments

Enclosure 4 of the supplemental letter dated May 5, 2005 (Reference 2) provides a comparison of each plant's approved QA program with the new NFQAPD. Changes are characterized as: 1) a reduction in commitment, 2) not a reduction in commitment, or 3) an increase in commitment. The regulatory change control process described in 10 CFR 50.54(a) classifies changes as non-reductions (50.54(a)(3)) or reductions (50.54(a)(4)) in commitment. Changes that increase commitments (i.e., are clearly more conservative in meeting Appendix B requirements) are made at the discretion of the licensee.

Many of the non-reductions in commitment are the result of changes in format or level of detail. The regulation as described in 10 CFR 50.34(b)(6)(ii) requires that QA program descriptions discuss how the requirements of Appendix B regarding managerial and administrative control will be satisfied. Several changes, which were previously reviewed by the NRC staff for other licensees, were characterized as non-reductions under the provisions of 10 CFR 50.54(a)(3)(ii). Two NRC SEs which approved QA changes were cited by the licensee.

1. NRC SE for Exelon (Reference 3) stated that NQA-1-1994 was equivalent to NQA-1-1983. As such, the licensees replaced the references in its commitments to RG 1.8 Revision 3, and RG 1.28 Revision 3, to NQA-1-1994.

2. NRC SE for Perry Nuclear Power Plant (Reference 5) allowed the minimum number of full-time engineers serving on the Independent Safety Engineering Group to be reduced from five to four. MPS1, 2 and 3 had adopted this change prior to the proposed NFQAPD submittal. The licensees will make this alternative applicable to all facilities with the implementation of the NFQAPD.

The NRC staff reviewed the bases cited by the licensees and concluded that the bases for the changes are applicable to the licensees' facilities.

The provisions of 10 CFR 50.54(a)(4) require NRC staff review of any changes characterized as reductions in commitment prior to implementation. Enclosure 4 of the May 5, 2005, supplemental letter identifies changes characterized by the licensees as "reductions in commitment," and provides the basis for the acceptability of each change. The following licensee-stated reductions in commitment were identified:

1. Commitment to Regulatory Position C.2.1.1 and C.2.1.3 of RG 1.8, Revision 3, has been modified to allow approval and documentation by the plant manager or the responsible executive of 'other factors' that sufficiently demonstrate an individual's abilities who does not have formal education and experience requirements for QA.

2. Current commitment to RG 1.30, August 1972, and ANSI N45.2.4-72 is replaced. With the adoption of NQA-1-1994 Subpart 2.4 (ANSI/IEEE [Institute of Electrical and Electronics Engineers] Std. 336-85), commitment to RG 1.30 and ANSI N45.2.4-72 is no longer necessary since NQA-1-1994 contains equivalent requirements.

3. Current commitment to implement parts of RG 1.33, February 1978, is updated. 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 the NFQAPD.

4. Current commitment to RG 1.37, March 1973, and ANSI N45.2.1-73 is replaced. With the adoption of NQA-1-1994 Subpart 2.1, commitment to RG 1.37 and ANSI N45.2.1-73 is no longer necessary since NQA-1-1994 contains equivalent requirements.

5. Current commitment to RG 1.38, May 1977, and ANSI N45.2.2-72 is replaced. With the adoption of NQA-1-1994 Subpart 2.2, commitment to RG 1.38 and ANSI N45.2.2-72 is no longer necessary since NQA-1-1994 contains equivalent requirements.

6. Current commitment to RG 1.39, September 1977, and ANSI N45.2.3-73 is replaced. With the adoption of NQA-1-1994 Subpart 2.3, commitment to RG 1.39 and ANSI N45.2.3-73 is no longer necessary since NQA-1-1994 contains equivalent requirements.

7. Current commitment to RG 1.94, April 1976, and ANSI N45.2.5-74 is replaced. With the adoption of NQA-1-1994 Subpart 2.5, commitment to RG 1.94 and ANSI N45.2.5-74 is no longer necessary since NQA-1-1994 contains equivalent requirements.

8. Current commitment to RG 1.116, May 1977, and ANSI N45.2.8-75 is replaced. With the adoption of NQA-1-1994 Subpart 2.8, commitment to RG 1.116 and ANSI N45.2.8-75 is no longer necessary since NQA-1-1994 contains equivalent requirements.

9. NAS1 and 2 and SPS1 and 2 are committed to RG 1.74, February 1974, and ANSI N45.2.10-73. With the commitment to RG 1.28, Revision 3, and the adoption of NQA-1-1994, commitment to RG 1.74 and ANSI N45.2.10-73 is no longer necessary since NQA-1-1994 contains equivalent requirements.

The NRC staff reviewed the bases for these commitments and concluded that they continue to meet Appendix B requirements and, therefore, are acceptable. Consolidation of the site-specific programs is acceptable in that it continues to meet the requirements of 10 CFR Part 50 Appendix B.

Although not a requirement, the licensee identified changes that were characterized as being an increase in commitment. The identified increases in commitment are as follows:

1. Qualification requirements for support staff, including QA and Quality Control, have been changed to ANSI/ANS 3.1-1993 as endorsed by RG 1.8, Revision 3, May 2000.

2. Increase in MPS1, 2 and 3 commitment which adds a conditional commitment to RG 1.26, Revision 3, based on a current commitment in NAS1 and 2, and SPS1 and 2 Updated Final Safety Analysis Reports. The alternative indicates that the specific A, B, C, and D quality groups of RG 1.26 are not used. This maintains consistency with the classification programs presently used at the facilities.

3. Increase in commitment to implement the requirements of Subpart 2.15 to NQA-1-1994 with one alternative. Although the licensees may choose to not use the specific classification of Categories A, B, and C, it will ensure that items to be handled are evaluated and the appropriate range of controls and requirements for the activity are applied consistent with this Subpart.

4. Increase in commitment to implement the requirements of Subpart 2.16 to NQA-1-1994 with two alternatives. All references to NQA-1, NQA-2 and ANSI/ANS-3.2 are changed to refer to NQA-1-1994. The second alternative states that 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.

5. Increase in commitment to implement the requirements of Subpart 2.18 to NQA-1-1994 with two alternatives. All references to ANS-3.2 are changed to refer to NQA-1-1994. The second alternative states that personnel responsible for performance of the work are required to ensure that they are using the appropriate maintenance procedure.

6. New commitment for NAS1 and 2 and SPS1 and 2 to RG 1.28, Revision 3. Unlike MPS1, 2 and 3, NAS1 and 2 and SPS1 and 2 were not committed to an earlier revision of RG 1.28.

The NRC staff reviewed the basis for each increase in commitment and concluded that the revised commitments continue to meet Appendix B requirements and, therefore, are acceptable.

4.3 The Licensees' NFQAPD

The currently-approved QA programs for MPS1, 2 and 3, NAS1 and 2, SPS1 and 2, follow the guidance of ANSI N18.7-1976, ANSI N45.2 series of standards, and corresponding RGs. Since the proposed NFQAPD is based on a newer standard, understanding the evolution of NQA-1 is important to establishing the acceptability of the proposed basis for the NFQAPD.

In 1979, the ASME Committee on Nuclear Quality Assurance issued a new standard NQA-1-1979, based on N45.2-1977 and seven programmatic standards of the N45.2 series. In 1985, NRC RG 1.28 Revision 3 endorsed NQA-1-1983 as an acceptable method for complying

with the provisions of Appendix B with regard to implementing the requisite QA program for the design and construction of nuclear power plants. In 1994, NQA-1-1994 incorporated an additional seven, non-programmatic N45.2 standards. As such, NQA-1-1994 sets forth requirements and nonmandatory guidance for the establishment and execution of QA programs for nuclear facility applications. In addition, NRC RG 1.33 Revision 2 endorsed ANSI N18.7-1976 as an acceptable basis for complying with the QA program provisions of Appendix B for the operations phase of nuclear power plants. In December 2002, the NRC staff approved NQA-1-1994, in conjunction with ANSI N18.7-1976, as a method acceptable to the NRC staff for complying with the Commission's regulations for Exelon's operational QA programs (Reference 3).

As stated in the licensees' application, the proposed NFQAPD is based on NQA-1-1994. Attachment 3 of the submittal provides a comparison of the current N45.2 series QA standards, to which the licensees' QA programs have made commitments, with NQA-1-1994. Based on its review, the NRC staff concludes that the licensees' adoption of NQA-1-1994, as implemented through the NFQAPD, adequately addresses the commitments to the subject N45.2 standards and is, therefore, an acceptable method of implementing the applicable Appendix B requirements.

The administrative requirements of ANSI N18.7-1976 are incorporated into the text of the NFQAPD. The principal difference between ANSI N18.7-1976 and NQA-1-1994 is that the inclusion of administrative controls were not incorporated into NQA-1-1994. Attachment 4 of the licensees' submittal compares ANSI N18.7-1976 guidance with the proposed NFQAPD commitments and the applicable requirements of NQA-1-1994. Attachment 4 demonstrates that, where differences between the QA requirements of ANSI N18.7-1976 and NQA-1-1994 exist, substantive commitments have been included in the NFQAPD. The NRC staff has reviewed the comparison presented in Attachment 4, applicable sections of the NFQAPD, and the licensees' stated positions with respect to RG 1.28, Revision 3 and RG 1.33, Revision 2. Based on its review, the NRC staff concludes that the licensees adequately incorporated ANSI N18.7-1976, as necessary, into the proposed NFQAPD.

4.3.1 Exceptions and Alternatives to NQA-1-1994

Where the licensees have taken an exception or alternative to the guidance of NQA-1-1994, or an existing ANSI standard, it is addressed in the applicable section of the NFQAPD. Attachment 2 of the submittal, as supplemented by Enclosure 4 of Reference 2, provides the bases for each NFQAPD alternative or exception to NQA-1-1994 or existing ANSI standard, some of which have been previously approved by the NRC via license amendments. The exceptions or alternatives to Part I of NQA-1-1994 include the following:

1. RG 1.28, Revision 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.

2. 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. However, in lieu of

being certified as Level I, II, and III in accordance with NQA-1-1994, the licensees' personnel performing operations-phase independent quality verification inspections, examinations, measurements, or test 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 was approved for the Nuclear Management Company by NRC letter, dated March 24, 2005 (Reference 4).

3. An additional alternative to NQA-1-1994 Appendix 2A-1 is the definition of a qualified engineer. Specifically, 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.

4. 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 nondestructive examination personnel. The company will implement the qualification program required by this supplement in accordance with the applicable standard for the facilities' commitment to the ASME Code or other applicable code governing the activity.

5. 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 Electric Power Research Institute (EPRI) NP-5652, "Guideline for the Utilization of Commercial-Grade Items in Nuclear Safety-Related Applications," the licensees will use the guidance contained in EPRI NP-5652 instead of the NQA-1-1994 requirements.

6. 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 (e.g., maintenance group), the inspectors functionally report to the appropriate management position responsible for nuclear station safety and licensing or for assuring supplier quality while performing the inspection activity. The inspection program maintains reporting independence of inspectors by ensuring individuals performing the inspections are not the same individuals or supervisors responsible for performing the activity being inspected.

7. NQA-1-1994, Supplement 17S-1, “Supplementary Requirements for Retention of Records,” subsection 2.8 states that the retention period for nonpermanent records is required to be established in writing. The licensees will meet NRC RG 1.28 Regulatory Position C.2 except that the reference to ASME NQA-1 will be to the 1994 edition.

The NRC staff has examined the licensees’ basis for adopting NQA-1-1994, as implemented through the NFQAPD, as the basis for the licensees’ QA program description and finds it to be an acceptable method for complying with the with the Commission’s regulations with regard to overall QA program requirements for the operation phase of nuclear power plants. The NRC staff has also reviewed the basis for each exception and alternative to NQA-1-1994 and concluded that the exceptions and alternatives continue to meet Appendix B requirements and, therefore, are acceptable.

4.4 Assessment of QA Program Against 10 CFR Part 71 Subpart H, and Part 72 Subpart G

As noted in Section 3 of this SE, the NRC staff also performed an assessment of the NFQAPD, Topical Report DOM-QA-1, Revision 0 against the requirements under 10 CFR Part 71 Subpart H, and 10 CFR Part 72 Subpart G. This assessment covered the same areas identified in Sections 4.1.1 - 4.1.18 of this SE.

The NFQAPD describes requirements, procedures, and controls that, when properly implemented, comply with requirements of 10 CFR Part 71, and 10 CFR Part 72. In particular:

> The structure of the organization and assignment of responsibility for each activity ensure that designated parties will perform the work to achieve and maintain specified quality requirements.
>
> Conformance to established requirements will be verified by qualified personnel and groups not directly responsible for the activity being performed. These personnel and groups report through a management hierarchy which grants the necessary authority and organizational freedom and provides sufficient independence from economic and scheduling influences.
>
> The Quality Program Description is well-documented and provides adequate control over activities affecting quality, as well as structures, systems, and components important to safety, consistent with their relative importance to safety.

Based on the assessment of the NFQAPD, the NRC staff determined that the NFQAPD meets the requirements of Subpart H of 10 CFR Part 71, and Subpart G of 10 CFR Part 72 and, therefore, is acceptable. While this assessment determined that the NFQAPD is acceptable, continued proper implementation of the NFQAPD will be assessed during future NRC inspections.

5.0 CONCLUSION

The NFQAPD conforms to the format of SRPs 17.1 and 17.2 while following SRP 17.3 for guidance on attributes and level of details. Appendices to the NFQAPD address commitments for management and independent review, RG and quality standards, definitions of terms in

addition to those provided in NQA-1-1994, and additional QA record requirements for operating facilities. The NRC staff used the acceptance criteria of SRP 17.3 as the basis for evaluating the acceptability of the NFQAPD in conformance with the provisions of 10 CFR 50.34(b)(6)(ii). On the basis of the NRC staff's review of the licensees' NFQAPD, the NRC staff concludes the following:

1. The NFQAPD acceptably describes the authority and responsibility of management and supervisory personnel, performance/verification personnel, and self-assessment personnel.

2. The organizations and persons responsible for performing the verification and self-assessment functions have the authority and independence to conduct their activities without undue influence from those directly responsible for costs and schedules.

3. The NFQAPD applies to activities and items that are important to safety.

4. The NFQAPD describes a philosophy and controls that, when properly implemented, comply with the requirements of Appendix B and Criterion 1 of Appendix A to 10 CFR Part 50, 10 CFR Part 21, 10 CFR 50.55a, and 10 CFR 50.55(e), with the criteria contained in SRP 17.3, and in conformance with 10 CFR Part 71 Subpart H, and 10 CFR Part 72 Subpart G, and with the regulatory positions in the following RGs:

   RG 1.8, Revision 1-R (Reissued May 1977) - applies to MPS1, 2 and 3 only.

   RG 1.8, Second Proposed Revision 2 (September 1980) - applies to NAS1 and 2, and SPS1 and 2 facilities only.

   RG 1.8, Revision 3 (May 2000).

   RG 1.26, Revision 3 (February 1976).

   RG 1.28, Revision 3 (August 1985).

   ANSI/ASME NQA-1-1994.

   RG 1.29, Revision 3 (September 1978).

   RG 1.33, Revision 2 (February 1978).

   RG 1.36, Revision 0 (February 1973).

   RG 1.54, Revision 0 (June 1973).

   RG 1.152, Revision 1 (January 1996).

   RG 1.143, Revision 2 (November 2001).

   RG 4.15, Revision 1 (February 1979).

RG 7.10, Revision 1 (June 1986).

Generic Letter 89-02/EPRI-NP-5652.

Branch Technical Position ASB/CMEB 9.5-1.

Generic Letter 85-06 (commitments are site-specific, see each facility's safety analysis report (SAR) for details).

RG 1.97 (commitments are site-specific, see each facility's SAR for details).

NUREG-1567.

Based on review of the licensees' consolidated QA program, described in the proposed NFQAPD, the NRC staff concludes that the single QA program can be applied to the seven nuclear plants referenced in the submittal. The NRC staff's review included a comparison of the commitments contained in the current, approved QA programs for each of the referenced plants. The NRC staff evaluated the bases provided by the licensees for each of the numerous reductions in program commitments. The adoption of NQA-1-1994 in conjunction with the NFQAPD, which incorporates supplementary requirements of ANS N18.7-1976, was determined to provide an acceptable basis for the QA program description. The licensees' positions with respect to applicable standards and RGs were reviewed and found acceptable. The acceptance criteria of SRP 17.3 were used in evaluating the content of the licensees' QA program description. On the basis of its review, the NRC staff concludes that the NFQAPD adequately describes the licensees' QA program. Accordingly, the NRC staff concludes that the licensees' NFQAPD complies with the applicable NRC regulations and industry standards and can be implemented for MPS1, 2 and 3, NAS1 and 2, and SPS1 and 2 nuclear facilities.

6.0 REFERENCES

1. Christian, D. A., Dominion Nuclear Connecticut, Inc. and Virginia Electric and Power Company, to the NRC, "Virginia Electric and Power Company, Dominion Nuclear Connecticut, Inc., Surry Power Station Units 1 and 2 and ISFSI, North Anna Power Station Units 1 and 2 and ISFSI [independent spent fuel storage installation], Millstone Power Station Units 1, 2, and 3 and ISFSI Associated Radioactive Material Packages Nuclear Facility Quality Assurance Program Description Topical Report DOM-QA-1, Revision 0," August 24, 2004.

2. Grecheck, E. S., Dominion Nuclear Connecticut, Inc. and Virginia Electric and Power Company, to the NRC, "Dominion Nuclear Connecticut, Inc., Virginia Electric and Power Company, Millstone Power Station Units 1, 2, and 3, North Anna Power Station Units 1 and 2, Surry Power Station Units 1 and 2, Response to Requests for Additional Information on Nuclear Facility Quality Assurance Program Description and Associated Proposed Technical Specifications Changes," May 5, 2005.

3. Chawla, M., NRC, to J. L. Skolds, Exelon Nuclear, “Approval of Proposed Revision 70 of Quality Assurance Topical Report EGC-1A, Rev. 70, in Accordance with 10 CFR 50.54(a) Requirements for Exelon/Amergen Plants,” (ADAMS Accession Number ML023440300), December 24, 2002.

4. Spaulding, D. W., NRC, to E. J. Weinkam, “Approval of Nuclear Management Company Quality Assurance Topical Report,” (ADAMS Accession Number ML050700416), March 24, 2005.

5. Pickett, D. V., NRC, to L. W. Meyers, Centerior Service Company, “10 CFR 50.54(a)(3) Organizational Change for the Independent Safety Engineering Group - Perry Nuclear Power Plant, Unit No. 1 (TAC MA3325),” September 16, 1998.

Principal Contributors: K. Kavanagh
J. Pearson
V. Nerses

Date: September 9, 2005