QA Program Standardization Project

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NRC Presentation February 6, 2006

QA Program Standardization Project

- Current QA Program Basis
  - FPL and Seabrook based on ANSI N18.7, ANSI N45.2 and other Construction Era Standards. Duane Arnold is based on NQA-1 (1994)
  - In some cases plants commit to different revisions of the basis documents
  - Plants take different alternates/exceptions to many of the commitments contained in the QA Program standards
- Proposed QA Program Basis
  - ASME NQA-1 (1994) based
  - One QATR for the FPL Fleet containing all QA Program Commitments
  - Simple reference to QATR in the FSARs
  - NRC approved alternates and exceptions

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QA Program Standardization Project
Why We Are Doing It

- Reasons for QA Program Standardization Project
  - Remove a significant impediment to standardization of processes across the FPL Fleet
  - Use of NQA-1 which is a supported and maintained standard
  - Simpler and easier to understand program
  - Reduced administrative burden
  - Reduced organizational detail precluding the need for frequent QATR / FSAR changes
  - Facilitate further expansion of the FPL Nuclear Fleet

QA Program Standardization Project
How We Did It

- QA Program Standardization Strategy
  - Developed a Fleet QATR model (NMC NRC approved QATR modified to reflect organizational differences)
  - Performed a detailed review of each plant's QA Program commitments against the Fleet QATR model.
  - Identified differences (both over and under commitments)
  - Reviewed each proposed QATR section and matrix of differences using the QA Program review process
  - Resolved differences and developed final Fleet QATR

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Proposed Submittal Package

- **<u>Documentation Package to be Submitted to NRC</u>**
  - FPL QATR Request to NRC Letter
  - Enclosure 1 - QATR Revision 0a
  - Enclosure 2 - QATR Comparison Matrices
    Enclosure 2-1 Duane Arnold
    Enclosure 2-2 Seabrook
    Enclosure 2-3 St. Lucie
    Enclosure 2-4 Turkey Point
  - Enclosure 3 - List of QATR Exceptions/Alternatives to NMC-1

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NRC Submittal - QATR Contents

- Introduction
- A. Management
  - A.1 Methodology
  - A.2 Organization
  - A.3 Responsibility
  - A.4 Authority
  - A.5 Personnel Training and Qualification
  - A.6 Corrective Action
  - A.7 Regulatory Commitments
- B. Performance/Verification
  - B.1 Methodology
  - B.2 Design Control
  - B.3 Design Verification
  - B.4 Procurement Control
  - B.5 Procurement Verification
  - B.6 Identification and Control of Items
  - B.7 Handling, Storage and Shipping
  - B.8 Test Control
  - B.9 Measuring and Test Equipment Control
  - B.10 Inspection, Test and Operating Status
  - B.11 Special Process Control
  - B.12 Inspection
  - B.13 Corrective Action
  - B.14 Document Control
  - B.15 Records
  - B.16 Plant Maintenance
  - B.17 Computer Software Control
- C. Assessment
  - C.1 Methodology
  - C.2 Self-assessment
  - C.3 Independent Assessment
- Appendices
  - APPENDIX A - On-Site Review Group
  - APPENDIX B - Procedures
  - APPENDIX C - Definitions
  - APPENDIX D - Revision Summaries

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NRC Submittal - Enclosure 2 Example

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
UFSAR 13.4 REVIEW AND AUDIT	Section C ASSESSMENT Appendix A On-Site Review Group	R – #1	The words in the current program "Regulatory Guide 1.33 and ANSI N18.7-1976/ANS 3.2 requirements for reviews and audits form the basis for the program" is not in the proposed program.	While this is less than in the current program, it is not a reduction in commitments as defined in 10 CFR 50.54(a)(3)(ii). The NRC and NMC have already determined that this meets 10 CFR 50, Appendix B as documented in NRC Safety Evaluations dated 9/1/05, 3/24/05 and 1/13/05 approving Revisions 1 and 0 of NMC-1 and in NMC transmittals to the NRC such as those dated 10/31/03 and 6/17/05.
13.4.1 Onsite Review	Appendix A On-Site Review Group	R - #2	Note name difference between current program (SORC) and proposed program (ORG). The current program details the responsibility of the Station Operation Review Committee (SORC) and Company Nuclear Review Board (CNRB). The proposed program eliminates the CNRB and combines responsibilities under the Onsite Review Group (ORG).	See above.
13.4.2 Independent Review	Appendix A On-Site Review Group	R - #2 (same as earlier)	The current program details the responsibility of the Station Operation Review Committee (SORC) and Company Nuclear Review Board (CNRB). The proposed program combines these into the Onsite Review Group. Many of the details contained in this section of the current program should be contained in lower tier procedures of the proposed program.	See above.
13.4.3 Independent Technical Reviews		R – #3	The Technical Review Program described in the current program is not in the proposed program.	SER dated 8/26/99. Transmitted to Mr. J.A. Scalice (TVA) from Mr. H. N. Berkow (NRC).

Note 1:
R - Reduction in commitment
N - Not a reduction in commitment
I - Increase in commitment

NRC Submittal - Enclosure 3 Example

QATR Exception	Source/Basis for Acceptance
Section B.4 • FPL may apply a 90-day grace period to requirement to audit suppliers on a triennial basis. When the grace period is applied, the next due date for the activity is based upon the original scheduled date. However, in all cases the periodicity shall not exceed three-year plus 90 days. This is an alternate to Position C.3.2.1 of Regulatory Guide 1.28, Revision 3. • When purchasing commercial grade calibration services from a supplier that has been accredited by a nationally recognized accrediting body (NAVLAP or other accrediting body recognized by NAVLAP via a Mutual Recognition Agreement (MRA)), FPL may accept the accreditation in lieu of performing an audit, accepting an audit by another licensee or conducting a commercial grade survey. In order to accept the accreditation FPL will perform a documented review of the supplier's accreditation.	a. FPL takes exception to Regulatory Position C.3.2 concerning a grace period for the triennial audits of suppliers. This meets Criterion XVIII of 10 CFR 50, Appendix B insofar as audits of suppliers are still periodic. Reference the SER contained in NRC letter from G. S. Vissing to R. C. Mecredy, RG&E, dated July 22, 1998. b. FPL may accept of a supplier of commercial grade calibration services other than by audit. This meets Criterion VII of 10 CFR 50, Appendix B insofar as measures are established to assure that calibration services conform to the procurement documents by source evaluation and selection and objective evidence of quality furnished by the calibration supplier, as appropriate. Reference the SER contained in NRC letter from D. S. Collins to G. R. Overbeck, APS.
Section B.14 Temporary changes to procedures identified in Appendix B are approved by two members of plant staff knowledgeable in the areas affected by the procedure, at least one of whom is a person holding a senior reactor operator's license.	FPL does not require that one of the two members of plant staff who approve temporary changes to procedures hold an active senior reactor operator license. Rather, the person's license may be inactive. While this may mean that the person's knowledge of current plant configuration is not as extensive as the holder of an active license, the approver does have an understanding of the operation of the plant as well as access to plant and other documentation. This meets Paragraph 17.3.II.B.14.c insofar as revisions to controlled documents are approved by qualified and knowledgeable personnel. It also meets Criterion VI of 10 CFR 50, Appendix B insofar as changes to documents are approved by authorized personnel.

Project Goals

Once documentation package is submitted to NRC*

- Informal working relationship - answer questions and resolve without a large number of Requests for Additional Information
- 4-6 month turnaround time to facilitate QATR implementation at each of the sites by year-end
- Ability to add any future units with minimal difficulty

* Goal for submittal is end of February

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Discussion