Florida Power & Light Company, 700 Universe Boulevard, Juno Beach, FL 33408

FPL.

March 31, 2006

L-2006-067
10 CFR 50.54(a)(3)
10 CFR 50.54(a)(4)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

RE: Florida Power and Light Company
St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

FPL Energy Seabrook, LLC
Seabrook Station
Docket No. 50-443

FPL Energy Duane Arnold, LLC
Duane Arnold Energy Center
Docket No. 50-331

Request for Approval of FPL Quality Assurance Topical Report

Florida Power and Light Company (FPL), the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, and FPL Energy Seabrook, LLC (FPL Energy Seabrook), the licensee for Seabrook Station, and FPL Energy Duane Arnold, LLC (FPL Energy Duane Arnold), the licensee for Duane Arnold Energy Center (hereafter referred to collectively as FPL), are submitting a common Quality Assurance Topical Report (QATR) for your review and approval in accordance with 10 CFR 50.54(a)(4). The FPL QATR will be applied to 10 CFR 50 licensed activities. In addition, FPL also requests NRC review and approval to apply the program to 10 CFR 71 and 10 CFR 72 activities in accordance with 10 CFR 71.101(f) and 10 CFR 72.140(d). Following approval and plant-specific implementation, the FPL QATR (Enclosure 1) will replace the current St. Lucie Nuclear Plant and Turkey Point Nuclear Plant Topical Quality Assurance Report (TQAR) FPL TQAR 1-76A and the site-specific quality assurance programs for Seabrook Station and Duane Arnold Energy Center.

Enclosure 2 provides for each plant a comparison of that plant's existing program with the new QATR. Enclosure 2 also, as required by 10 CFR 50.54(a)(4)(ii), identifies changes considered to be reductions in commitment as defined in 10 CFR 50.54(a)(3), and provides a basis for concluding that the program, as changed, continues to meet 10 CFR 50, Appendix B requirements and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC. Because of the extensive formatting differences involved, FPL considers that the combination of the QATR and the site comparison matrices included with this letter fulfill the requirement of 10 CFR 50.54(a)(4)(ii) to submit "all pages affected by that change."

Q004

The FPL QATR contains explicit commitments to applicable quality assurance requirements in ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Applications." This topical report is largely based on Nuclear Management Company's Quality Assurance Topical Report NMC-1, Revision 1. The acceptability of the use of NQA-1-1994, Part 1 is based on a Safety Evaluation by the Office of Nuclear Reactor Regulation (Ms. Deirdre Spaulding (NRC) to Mr. Edward Weinkam (NMC) dated September 1, 2005) approving Revision 1 of NMC-1. Additionally, NRC safety evaluations dated January 13, 2005 and March 24, 2005 approved Revision 0 of NMC-1.

In accordance with 10 CFR 50.54(a)(3)(ii), the use of a quality assurance alternate approved by an NRC safety evaluation, provided the bases of the NRC approval are applicable to the licensee's facility, is not a reduction in commitments. Where exceptions or alternatives to NMC-1 have been deemed to be appropriate, they are described within the text of the program. Enclosure 3 is a compilation of exceptions, including the original sources of NRC approval. In accordance with 10 CFR 50.54(a)(4)(ii), the attachment does not provide the bases for changes that correct spelling, punctuation, or editorial items.

Florida Power and Light Company, FPL Energy Seabrook, and FPL Energy Duane Arnold plan to implement the QATR at their plants by March 1, 2007, or within six months of NRC approval, whichever is later. In order to meet the implementation date, FPL requests NRC review and approval by September 1, 2006. Approval by this date will allow FPL to complete the necessary implementing actions, including procedure changes and relevant training, prior to the 2007 refueling outages scheduled at Duane Arnold, St. Lucie, and Turkey Point.

In recognizing that NRC review of this submittal may require more than the 60 days allotted in 10 CFR 50.54(a)(4)(iv), FPL hereby waives its right to acceptance of the QATR within 60 days after submittal absent an acceptance letter from the commission within the 60-day timeframe.

This letter contains a new commitment to implement the QATR at FPL plants by March 1, 2007, or within six months of NRC approval, whichever is later.

If there are any questions regarding this letter, please contact Bob Symes at (561) 694-4287.

Sincerely yours,

J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer

Enclosures: (see next page)

cc w/enclosures: (see next page)

Enclosures:
(1) The FPL Quality Assurance Topical Report, Revision 0 (unsigned)
(2) Existing Site QA Programs to the Quality Assurance Topical Report Comparison Matrices (4)
(3) List of Exceptions and Alternatives to NMC-1

cc:	Regional Administrator, Region I	w/enclosures
	Regional Administrator, Region II	"
	Regional Administrator, Region III	"
	USNRC Project Manager, St. Lucie and Turkey Point	"
	Senior Resident Inspector, USNRC, St. Lucie	"
	Senior Resident Inspector, USNRC, Turkey Point	"
	USNRC Project Manager, Seabrook Station	"
	Senior Resident Inspector, USNRC, Seabrook Station	"
	USNRC Project Manager, Duane Arnold Energy Center	"
	Senior Resident Inspector, USNRC, Duane Arnold Energy Center	"

ENCLOSURE 1

FLORIDA POWER AND LIGHT COMPANY,
FPL ENERGY SEABROOK, LLC
AND FPL ENERGY DUANE ARNOLD, LLC

ST. LUCIE UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251
SEABROOK STATION
DOCKET NO. 50-443
DUANE ARNOLD ENERGY CENTER
DOCKET NO. 50-331

FEBRUARY 15, 2006

FLORIDA POWER AND LIGHT COMPANY,
FPL ENERGY SEABROOK, LLC
AND FPL ENERGY DUANE ARNOLD, LLC
QATR FPL-1
REVISION 0

56 PAGES FOLLOW

Florida Power and Light Company, FPL Energy Seabrook, LLC and FPL Energy Duane Arnold, LLC

Quality Assurance Topical Report

FPL-1

Florida Power and Light Company, FPL Energy Seabrook, LLC and FPL Energy Duane Arnold, LLC– Policy

POLICY STATEMENT

Florida Power and Light Company, FPL Energy Seabrook, LLC, and FPL Energy Duane Arnold, LLC (hereafter referred to collectively as FPL) shall maintain and operate nuclear plants in a manner that will ensure the health and safety of the public and workers. Facilities shall be operated in compliance with the requirements of the Code of Federal Regulations, the applicable Nuclear Regulatory Commission (NRC) Facility Operating Licenses, and applicable laws and regulations of the state and local governments.

The FPL Quality Assurance Program (QAP) described herein and associated implementing documents provide for control of FPL activities that affect the quality of safety related nuclear plant structures, systems, and components. The QAP is also applied to certain quality related equipment and activities that are not safety related, but support safe plant operations, or where other regulatory or industry guidance establishes program requirements.

The Quality Assurance Topical Report (QATR) is the top-level policy document that establishes the manner in which quality is to be achieved and presents FPL's overall philosophy regarding achievement and assurance of quality. Implementing documents assign more detailed responsibilities and requirements and define the organizational interfaces involved in conducting activities within the scope of the QATR. Compliance with the QATR and implementing documents is mandatory for personnel directly or indirectly associated with implementation of the FPL QAP.

Signed: _____

J. A. Stall
Senior Vice President Nuclear Division and Chief Nuclear Officer, FPL

Florida Power and Light Company, FPL Energy Seabrook, LLC and FPL Energy Duane Arnold, LLC Quality Assurance Topical Report

FPL-1

Revision 0

Approved By:

Robert J. Acosta Director Nuclear Assurance	Date

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INTRODUCTION

The FPL Quality Assurance Topical Report (QATR) describes the methods and establishes quality assurance program and administrative control requirements which comply with the criteria of 10 CFR 50 Appendix B, and meets the requirements of Regulatory Guides and Industry Standards referenced in Section A.7 of this report. The Topical Quality Requirements and attached Policy Statement, together with Quality Instructions document the Program and the FPL policy with regard to Quality Assurance. This Program shall apply to St. Lucie Nuclear Plant, Turkey Point Nuclear Plant, Seabrook Station, and Duane Arnold Energy Center and shall be implemented at each plant site throughout the operating life of these FPL nuclear plants.

The requirements of the FPL Quality Assurance Program shall apply to nuclear safety related structures, systems, and components as identified in the Safety Analysis Report for each nuclear unit. Additionally, the requirements of the FPL Quality Assurance Program shall apply to all FPL, contractor, or consultant organizations performing activities affecting the quality of safety related structures, systems, and components of FPL nuclear power plants. Portions of the FPL Quality Assurance Program requirements are also applicable to quality related items and services. Those portions applicable to specific quality related items or services shall be delineated in appropriate instructions.

This QATR is organized and formatted to respond to NRC Standard Review Plan (NUREG-0800) Section 17.3 (Revision 0 – August 1990). FPL has chosen this approach because it best represents the FPL commitment to the philosophy that each individual, properly trained and motivated, achieves the highest quality of performance of which they are capable. In addition, FPL uses this emphasis on individual performance to reinforce the importance of self-assessments (by the group responsible for the activity) and independent assessments (by groups not responsible for the activity) to achieving excellence.

A. MANAGEMENT

A.1 Methodology

The Quality Assurance Topical Report (QATR) is the top-level policy document that establishes quality policy and assigns major functional responsibilities for plants operated by FPL. The following requirements apply to all organizations and positions that manage and perform activities within FPL's scope. The FPL organization is committed to implementing these requirements. FPL personnel engaged in supporting nuclear generation shall comply with the requirements of the Quality Assurance Program (QAP) described in this QATR. Contractors, or other organizations supporting FPL are required to comply with the QAP established by this QATR, or with their own programs having appropriate scope and controls in accordance with Section A.2. All facilities shall be operated in compliance with the applicable Code of Federal Regulations, NRC Operating Licenses, and the applicable laws and regulations of the state and local governments in which the facility is located.

The FPL QAP comprises those planned and systematic actions necessary to provide adequate confidence that structures, systems, and components will perform their intended safety functions. The QAP consists of the NRC approved regulatory document that describes the quality assurance program elements (the QATR) along with the associated quality instructions. Quality instructions establish responsibilities and authority for carrying out important functions; establish common practices for certain activities such that the activity is controlled and carried out in a manner that meets QAP requirements; and establish detailed implementation requirements and methods. In addition, to provide a clear understanding of FPL operating philosophy, FPL establishes rules of practice pertaining to personnel conduct and control, including consideration of job related factors which can influence the effectiveness of operating and maintenance personnel, including such factors as number of hours at duty station, availability on-call of professional and supervisory personnel, methods of conducting operations, and preparing and retaining plant documents. Such rules are contained within appropriate implementing documents.

The QAP applies to activities affecting the performance of safety related structures, systems and components, including, but not limited to, design; procurement; fabrication; installation; modification; maintenance; repair; refueling; operation; training, inspection; and tests. A list, or other means of identification, of safety related Systems, Structures, and Components (SSC) under the control of the QAP is established and maintained for each operating plant. The technical aspects of the items are considered when determining program applicability, including, as applicable, the item's design safety function, results of probabilistic safety analysis, the ASME Code and the other references cited in Section A.7.3 of this QATR. The QAP is also applied to certain activities where regulations other than 10CFR50 establish QA program requirements for activities within their scope. Thus, the QATR is applied to the "important to safety" activities of radioactive waste shipping and independent spent fuel storage, as defined in those NRC regulations, as allowed by 10CFR71.101.f and 10CFR72.140.d.

A.1. Methodology (Continued)

It is FPL's policy to assure a high degree of availability and reliability of its nuclear plants while ensuring the health and safety of the public and its workers. To this end, selected elements of the Quality Assurance Program are also applied to certain quality related equipment and activities that are not safety related, but support safe and reliable plant operations, or where other regulatory or industry guidance establishes program requirements. This quality related classification is applied to selected equipment, components, structures and services designed to support and/or protect the safety function of safety related equipment. Additionally, FPL applies selected elements of the Quality Assurance Program to emergency preparedness, security, radiation protection, and fire protection activities. Implementing documents establish program element applicability.

Activities affecting quality are prescribed by and performed in accordance with documents (such as instructions, procedures or drawings) of a type appropriate to the circumstances and which, where applicable, include quantitative or qualitative acceptance criteria. Such documents are prepared and controlled according to Section B.14. In addition, means are provided for dissemination to plant staff of instructions of both general and continuing applicability (e.g., dealing with job turnover and relief, designation of confines of the control room, limitations on access to certain areas), as well as those of short-term applicability (e.g., dealing with short-term operating conditions, publications, personnel actions). Provisions are included for review, updating, and cancellation of such instructions.

In establishing, implementing and maintaining the QATR, FPL commits to compliance with ASME NQA-1, 1994, Basic Requirement 2. QATR revisions are reviewed by FPL senior management and approved by the Director Nuclear Assurance. Changes to this QATR will be governed by and made in compliance with 10CFR50.54(a).

In establishing procedural controls, FPL commits to compliance with NQA-1, 1994, Basic Requirement 5. In addition, as stated in Position C.1 of Regulatory Guide 1.33, Revision 2, FPL commits to use Appendix A of Regulatory Guide 1.33 as guidance for establishing the types of procedures that are necessary to control and support plant operation. Requirements specific to procedures are also provided in Appendix B of this QATR.

A.2 Organization

This section describes the FPL organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAP implementation. The organizational structure includes corporate functions and onsite functions at each plant. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of this QATR.

The Chief Nuclear Officer FPL has overall responsibility for establishing quality policy and implementation of the quality program. The authority to accomplish quality assurance functions is delegated to the staff as necessary to fulfill the identified responsibilities.

Personnel executing performance activities and those performing verification activities are functionally independent to the degree commensurate with the activity's relative importance to safety. The method and extent of verification is commensurate with importance of the activity to plant safety and reliability. The organization executing independent assessment activities maintains independence from the organization(s) performing the activity being assessed. Management positions are established both offsite and onsite for carrying out the independent assessment functions. Individuals filling these positions:

- Have sufficient authority and organizational freedom to implement their assigned responsibilities, including authority to obtain access to records and personnel as needed to perform assessments.
- Report to a sufficiently high management level to ensure that cost and schedule considerations do not unduly influence decision making.
- Have effective lines of communication with persons in other senior management positions.
- Have no unrelated duties or responsibilities that would preclude full attention to assigned responsibilities.

Responsible individuals or organizations may delegate any or all of their responsibility. When work is delegated to personnel or organizations outside of FPL the responsibility for the program effectiveness and the work is retained by FPL, and the delegation shall be identified and described such that:

- The organizational elements responsible for the work are identified.
- Management controls and lines of communication are established.
- Responsibility for an appropriate QAP and extent of FPL management oversight is established.
- Performance of delegated work is formally evaluated by FPL.

A.2 Organization (Continued)

In establishing its organizational structure, FPL commits to compliance with NQA-1, 1994, Basic Requirement 1 and Supplement 1S-1. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

A.2.1 Corporate Organization

The following positions have the described corporate functional responsibilities. Some titles and reporting relationships may vary between corporate and some sites, but in all cases there is a designated position to carry out the defined responsibilities.

A.2.1.1 Chief Executive Officer (CEO)

This position is responsible for overall corporate policy and provides executive direction and guidance for the corporation as well as promulgates corporate policy through FPL's senior management staff.

A.2.1.2 Chief Nuclear Officer (CNO)

This position reports to the CEO and has overall responsibility for the implementation of the QAP and for the Nuclear Division's activities including corporate responsibility for overall plant nuclear safety. This responsibility includes setting and implementing policies, objectives, and priorities to ensure activities are performed in accordance with QAP and other corporate requirements. The CNO is designated as the Company Officer responsible for assuring that defects and non-compliances are reported to the NRC as required by 10CFR21.

A.2.1.2.a Vice President Nuclear Operations

This position reports to the CNO and is responsible for oversight of the day-to-day nuclear site operations, providing direction for each of the nuclear operating units, ensuring the highest standards of nuclear safety and the overall operating efficiencies and cost effectiveness of nuclear generation.

A.2.1.2.b Vice President Nuclear Operations Support

This position reports to the CNO and is responsible for nuclear plant operations support via staff at both the corporate and site levels. Responsibilities include security, training, nuclear information technology, performance improvement, operating experience, document control, records management, emergency preparedness, licensing, and fleet standardization. Some of these responsibilities may be assigned to the Site Vice President(s) at the discretion of the CNO.

A.2.1.2.c Vice President Nuclear Engineering

This position reports to the CNO and is responsible for nuclear plant design engineering and engineering support via staff at both the corporate and site levels. Responsibilities include engineering, major project engineering, nuclear fuel, probabilistic safety analysis, and special projects.

A.2 Organization (Continued)

A.2.1.2.d Vice President Nuclear Projects

This position reports to the CNO and is responsible for all activities associated with major projects, O & M and capital from inception to completion, including budget accountability. Responsibilities include overall management and allocation of supplemental labor at each site, both outage and non-outage.

A.2.1.2.e Vice President Integrated Supply Chain

This position reports to the Senior Vice President Engineering, Construction and Corporate Services and is responsible for coordinating contract activities; negotiating, generating, and issuing procurement documents for required items and services supporting the operation, licensing, maintenance, modification, and inspection of FPL nuclear plants, and for materials and equipment to support the Nuclear Division staff. Responsibilities also include the review of procurement documents to assure that technical and quality requirements developed by others and approved in accordance with company policies and procedures, are incorporated into the procurement documents that it authorizes, performance of receipt inspection to verify that purchased items comply with procurement document requirements, and controlling materials received at each FPL nuclear plant site in accordance with company policy and procedures.

A.2.1.2.f Director Nuclear Assurance

This position reports to the CNO and is responsible for activities that include establishing, maintaining, and interpreting quality assurance practices and policies (including this QATR); managing independent assessment (Quality Assurance (QA)) and establishing quality control practices and policies for quality verification activities.

Additional responsibilities include facilitating actions deemed necessary to prevent unsafe plant conditions or a significant violation of the QAP; periodically apprising the CNO of the status of the quality assurance program at FPL facilities and immediately apprising them of significant problems affecting quality; and verifying implementation of solutions for significant conditions adverse to quality identified by QA. Also responsible for establishing the requirements for assessor and inspector certification; and providing for supplier evaluation; the conduct of supplier assessments or surveys; and verification that supplier quality assurance programs comply with FPL requirements. This position entails Stop Work authority at the sites and corporate offices.

A.2 Organization (Continued)

A.2.2 Site Organization

The following site FPL management positions describe the typical site QAP functional responsibilities, which may be delegated to others as established in this document. The on-site operating organization includes one or more individuals knowledgeable in the following fields: nuclear power plant operation; nuclear power plant mechanical, electrical and electronic systems; nuclear engineering; chemistry and radiochemistry; radiation protection; and quality assurance. Some functions, such as operating experience, document control, or records management, may be aligned under different groups at different sites. Site procedures provide detailed organizational descriptions.

A.2.2.1 Site Vice President (SVP)

This position reports to the Vice President Nuclear Operations and is responsible for the operation, maintenance, and modification of the plant. In this position, the SVP acts as a liaison between the plants and corporate and is accountable for ensuring that the company policy and procedures are properly implemented and continued at the nuclear site.

A.2.2.1.a Plant Manager

This position reports to the Site Vice President and is responsible for the safe operation of the nuclear plant. The plant manager has control of the onsite resources necessary for the safe operation and maintenance regardless of organizational reporting.

In this position, the plant manager assures the safe, reliable, and efficient operation of the plant within the constraints of applicable regulatory requirements, operating license, and the QAP. Functional areas of responsibility also include chemistry activities, environmental services, fuel handling (receipt, movement, and storage), health physics/radiological protection, operations and support, maintenance and production planning, and related procedures and programs. The Onsite Review Group serves the plant manager in a technical capacity and provides review of plant safety and performance (see Appendix A).

A.2.2.1.b Licensing Manager

This position reports to the SVP and is responsible for site regulatory interfaces and licensing actions.

A.2.2.1.c Performance Improvement Manager

This position reports to the SVP or plant manager and is responsible for administration of the corrective action and self-assessment programs.

A.2 *Organization (Continued)*

The following positions report directly offsite, but functionally reports to a site position:

A.2.2.2.a Engineering Manager

This position reports directly to the Vice President Nuclear Engineering (offsite) and functionally interfaces with the SVP. The position has functional areas of responsibility that include authority for day-to-day engineering support activities, design engineering, engineering document control, engineering administration, modifications and their implementation, plant design configuration control, reactor engineering, system engineering, system testing, and technical support.

A.2.2.2.b Training Manager

This position reports to the Vice President Nuclear Operations Support (offsite) and functionally interfaces with the SVP and is responsible for training. The Training Manager provides direction, control, and overall supervision of training personnel and training for all site personnel as required. Functional areas of responsibility include training support services, technical training, and operations training.

A.2.2.2.c Site Manager of Projects

This position reports to the Vice President Nuclear Projects (offsite) with direct interface to the SVP and is responsible for installing plant modifications as a result of design changes and implementing other major projects.

A.2.2.2.d Site Quality Manager

This position reports to the Director Nuclear Assurance (offsite) and is responsible for site quality activities. Significant safety or quality issues requiring escalated action are directed through this position to senior management, as necessary. Functional responsibilities include conducting independent assessments of line and support activities; monitoring and assessing day-to-day station activities; stop work authority at the site; periodic reporting on the status and adequacy of the quality program; and providing quality verification and inspections.

A.2.2.2.e Nuclear Materials Manager

This position reports to the Vice President Integrated Supply Chain (offsite) with direct interface with the SVP. The position has functional areas of responsibility that include authority for day-to-day material support activities at the site. Activities include contract coordination, procurement document control, and receipt and control of material.

A.3 Responsibility

FPL retains and exercises the responsibility for the scope and implementation of an effective overall QAP. Positions identified in Section A.2 may delegate all or part of the activities of planning, establishing, and implementing the program for which they are responsible to others, but retain the responsibility for the program's effectiveness. Decisions affecting safety are made at the level appropriate for its nature and effect, and with any necessary technical advice or review.

Senior management is regularly apprised of assessment results evaluating the adequacy of implementation of the QAP through the assessment functions described in Section C.

FPL ensures that the QAP is properly documented, approved and implemented before an activity within the scope of the program is undertaken. Management is responsible to assure that processes and procedures comply with the QATR and other applicable requirements, and that employees comply with them. Individual managers ensure that personnel working under their management cognizance are provided the necessary training and resources to accomplish their assigned tasks. Managers and supervisors are responsible for timely and continuing monitoring of performance to verify that day-to-day activities are conducted safely and in accordance with applicable requirements.

As described in Section C.3, Quality Assurance is responsible to verify that processes and procedures comply with QATR and other applicable requirements, that such processes or procedures are implemented, and that management appropriately ensures compliance.

Documents that implement the quality program are approved by responsible management; distributed; and revised in accordance with procedures. Work within the scope of the QAP is accomplished in accordance with these documents.

In addition, operating personnel responsibilities include:

- The reactor operator's authority and responsibility for shutting down the reactor when it is determined that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection system set-points and automatic shutdown does not occur.

- The responsibility to determine the circumstances, analyze the cause, and determine that operations can proceed safely before the reactor is returned to power after a trip or an unexplained or unscheduled power reduction.

- The senior reactor operator's responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction.

- The responsibility to believe and respond conservatively to instrument indications unless they are proved to be incorrect.

A.3 Responsibility (Continued)

- The responsibility to adhere to the plant's Technical Specifications.
- The responsibility to review routine operating data to assure safe operation.
- The responsibility to take action to minimize personnel injury or damage to the facility and to protect the health and safety of the public in the event of an emergency not covered by approved procedures.

In establishing QAP responsibilities, FPL commits to compliance with NQA-1, 1994, Basic Requirement 1 and Supplement 1S-1.

A.4 Authority

When FPL delegates responsibility for planning, establishing, or implementing any part of the overall QAP, sufficient authority to accomplish the assigned responsibilities is delegated. Regardless of delegation, FPL retains overall responsibility.

Responsibility and authority to stop unsatisfactory work, as delineated in Section A.2, includes authority to control further processing, delivery, installation, operation or use of nonconforming items. This assures that cost and schedule considerations do not override safety considerations.

In establishing QAP authorities, FPL commits to compliance with NQA-1, 1994, Basic Requirement 1 and Supplement 1S-1.

A.5 Personnel Training and Qualification

Personnel assigned to implement elements of the QAP must be capable of performing their assigned tasks. To this end, FPL establishes and maintains formal indoctrination and training programs for personnel performing, verifying or managing activities within the scope of the QAP to assure that suitable proficiency is achieved and maintained. Generating site and support staff minimum qualification requirements are as delineated in plant Technical Specifications or other appropriate documents. Other qualification requirements may be established but will not reduce those required by plant Specifications. Sufficient managerial depth is provided to cover absences of incumbents. When required by code, regulation, or standard, specific qualification and selection of personnel is conducted in accordance with those requirements as established in the applicable FPL procedures. Indoctrination may include the administrative and technical objectives, requirements of the applicable codes and standards, and the QAP elements to be employed. Training for positions identified in 10CFR50.120 is accomplished according to programs accredited by the National Nuclear Accrediting Board of the National Academy for Nuclear Training that implements a systematic approach to training. Records of personnel training and qualification are maintained.

In establishing qualification and training programs, FPL commits to compliance with NQA-1, Basic Requirement 2, Supplements 2S-1, 2S-2, 2S-3 and 2S-4, and Non-mandatory Appendix 2A-1 with the following clarifications and exceptions:

- For Supplement 2S-1: Inspections, examinations or tests may be performed by individuals in the same organization as that which performed the work, provided that (a) the qualifications of the inspector for an activity are equal to or better than the minimum qualifications for persons performing the activity, (b) the work is within the skills of personnel and/or is addressed by procedures, and (c) if work involves breaching a pressure-retaining item, the quality of the work can be demonstrated through a functional test. When a, b and c are not met, inspections, examinations or tests are carried out by individuals certified in accordance with Supplement 2S-1. Individuals performing visual inspections required by the ASME Boiler and Pressure Vessel Code are qualified and certified according to Code requirements.
- In lieu of Nonmandatory Appendix 2A-1, FPL does not establish levels of qualification/ certification for inspection personnel. Instead, FPL establishes initial qualification requirements and determines individual qualification through evaluation of education, training and experience, and through demonstration of capability in performing the type of inspections expected on the job.
- In lieu of Supplement 2S-2, FPL will follow the applicable standard cited in the latest version(s) of Section XI of the ASME Boiler and Pressure Vessel Code approved by the NRC for use at FPL sites for qualification of nondestructive examination personnel.

A.5 Personnel Training and Qualification (Continued)

- For Supplement 2S-3: The requirement that prospective Lead Auditors have participated in a minimum of five (5) audits in the previous three (3) years is replaced by the following, "The prospective lead auditor shall demonstrate his/her ability to properly implement the independent assessment (audit) process, as implemented by FPL according to Section C.3 of this QATR, to effectively lead an assessment team, and to effectively organize and report results, including participation in at least one independent assessment or audit within the year preceding the date of qualification." The term "audit" and "independent assessment" are synonymous and may be used interchangeably throughout the QAP.

- For Supplement 2S-3: FPL may apply a 90-day grace period to the requirement for a documented annual evaluation of lead auditor proficiency. 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 one year plus 90 days.

A.6 Corrective Action

FPL management, at all levels, fosters a non-punitive ("no-fault") attitude toward the identification of conditions adverse to quality. This includes failures, malfunctions, deficiencies, deviations, defective material and equipment, abnormal occurrences, nonconformances, and out-of-control processes, including the failure to follow procedures.

FPL implements a corrective action program to promptly identify, control, document, classify, and correct conditions adverse to quality. In addition, for significant conditions adverse to quality, the program provides for cause evaluation and corrective actions to prevent recurrence. Provisions are also made to ensure that corrective actions for significant conditions adverse to quality are completed as intended and are not inadvertently nullified by subsequent actions. Results of evaluations of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality and significant adverse trends are reported to responsible management.

Prior to installation, nonconforming items are reviewed and accepted, rejected, repaired, or reworked, and are identified and controlled to prevent their inadvertent test, installation or use.

In establishing requirements for corrective action, FPL commits to compliance with NQA-1, 1994, Basic Requirements 15 and 16, and Supplement 15S-1.

A.7 Regulatory Commitments

A.7.1

Through this QATR, FPL commits to compliance with the following:

- 10CFR50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants"
- 10CFR Part 71, Subpart H, "Quality Assurance for Packaging and Transportation of Radioactive Material"
- 10CFR Part 72, Subpart G, "Quality Assurance for Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste"
- 10CFR Part 21, "Reporting of Defects and Non-Compliance"
- General Design Criterion 1, of Appendix A to 10CFR Part 50
- 10CFR50.55a, "Codes and Standards"

A.7.2

When applicable, for Class 1, 2, and 3 items covered by Section III of the ASME Boiler and Pressure Vessel Code, the code Quality Assurance requirements are supplemented by the guidance of applicable regulatory guides (see Section A.7.3).

A.7.3

FPL also is committed to carrying out the provisions of certain nuclear quality assurance industry standards, other than ASME NQA-1. The extent of the FPL commitment to each of the Regulatory Positions of related NRC Regulatory Guides and Generic Letters is specifically described below. Commitment to a particular Regulatory Guide does not constitute commitment to Regulatory Guides or other standards that may be referenced therein, unless otherwise noted.

- Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants" -- FPL commitments regarding qualification and training of personnel are described in Section A.5 of this QATR, which states that staff qualification requirements are as delineated in plant Technical Specifications or other documents, and that training for positions identified in 10CFR50.120 is accomplished according to programs accredited by the National Nuclear Accrediting Board of the National Academy for Nuclear Training.

A.7 Regulatory Commitments (Continued)

- Safety/Regulatory Guide 1.26, Revision (site specific) "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive Waste-Containing Components of Nuclear Power Plants" – Commitment to Safety/Regulatory Guide 1.26 is site specific, as required by the approved UFSAR/License at each FPL site. Sites may use this guidance to assist in establishing the lists of equipment to which this QAP applies, or for other purposes.

- Regulatory Guide 1.28, Revision 3, August 1985, "Quality Assurance Program Requirements (Design and Construction)" (ASME NQA-1, 1983a) – FPL does not commit to comply with position C.1 of this Regulatory Guide; instead of establishing three levels of qualification provided in Nonmandatory Appendix 2A-1, FPL establishes initial qualification requirements and determines individual qualification through evaluation of education, training and experience, and through demonstration of capability in performing the types of inspections expected for the job. FPL complies with position C.2 for record retention times, and position C.3.2 for external audits, with the exception that for position C.3.2.2, FPL will review the information described therein as it becomes available through its ongoing receipt inspection, operating experience, and supplier evaluation programs, in lieu of performing a specific evaluation on an annual basis. The results of the reviews are promptly considered for effect on a supplier's continued qualification and adjustments made as necessary (including corrective actions, adjustments of supplier audit plans, and input to third party auditing entities, as warranted). Additionally, results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality requiring additional action. In lieu of compliance with Regulatory Position C.3.1, FPL establishes independent assessment frequencies as described in Section C of this QATR. In lieu of NQA-1 1983a, FPL uses NQA-1 1994.

- Safety/Regulatory Guide 1.29, Revision (site specific) "Seismic Design Classification" – Some FPL plants were designed, constructed and licensed based on criteria available prior to this Regulatory Guide being issued. The specific design criteria and seismic designations are reflected in each plant's UFSAR, and in other docketed analysis. Thus, the commitment to Safety/Regulatory Guide 1.29 is site specific, as required by the approved UFSAR/License at each FPL site. Sites may use this guidance to assist in establishing the lists of equipment to which this QAP applies, or for other purposes.

A.7 Regulatory Commitments (Continued)

- Regulatory Guide 1.30, August 1972, "Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment," (ANSI N45.2.4-1972/IEEE 336-1971) – FPL substitutes NQA-1 1994, Subpart 2.4/IEEE 336-1985 for N45.2.4 in its commitment to Regulatory Guide 1.30. As noted in Regulatory Position C.1, Subpart 2.4 is being used in conjunction with NQA-1, Part 1, which replaced ANSI N45.2. As noted in Regulatory Position C.2, other industry standards may be referenced; the commitment in this QATR to NQA-1, Subpart 2.4 includes commitment to those standards to the extent necessary to implement Subpart 2.4 requirements. If NRC guidance applies to those referenced standards, it is followed. Regulatory Position C.3 indicates that the requirements of the endorsed standard should also be considered applicable during the operation phase of the nuclear power plant. This is addressed in Sections B.12 and B.16 of this QATR, which also establish any necessary exceptions or alternatives to the provisions of Subpart 2.4.

- Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operation)" (N18.7) – NQA-1 contains quality assurance requirements equivalent to those of ANSI N-18.7, and FPL has included in this QATR the remaining "administrative controls" elements from N-18.7 (1976). Therefore, FPL does not commit to compliance with the requirements of ANSI N-18.7. As recommended by Regulatory Position C.1, FPL uses Appendix A of RG 1.33 as guidance in establishing the types of procedures required for plant operation and support. Regulatory Position C.2 is no longer considered valid, as the referenced standards and guidance have now been incorporated into ASME NQA-1 1994, or are addressed specifically in this section. Regulatory Position C.3 does not apply since FPL does not use independent/offsite review. In lieu of compliance with Regulatory Position C.4, FPL establishes assessment topics and frequencies as described in Section C.3 of this QATR. In lieu of compliance with Regulatory Position C.5, FPL has established appropriate equivalent requirements within this QATR.

- Regulatory Guide 1.36, Revision 0, February 1973, "Nonmetallic Thermal Insulation for Austenitic Stainless Steel" – Some of the current FPL plants were committed to this Regulatory Guidance during original construction. Regulatory Guide 1.36 may be used for plant modifications on a case by case basis, but this QATR makes no generic commitment thereto.

A.7 Regulatory Commitments (Continued)

- Regulatory Guide 1.37, March 1973, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants," (ANSI N45.2.1-1973) – FPL substitutes NQA-1 1994, Subpart 2.1 for N45.2.1 in its commitment to Regulatory Guide 1.37. As noted in Regulatory Position C.1, other industry standards may be referenced; the commitment in this QATR to NQA-1, Subpart 2.1 includes commitment to those standards to the extent necessary to implement Subpart 2.1 requirements. If NRC guidance applies to those referenced standards, it is followed. Regulatory Positions C.3, C.4 and C.5 recommend alterations to certain provisions of N45.2.1. The provisions of NQA-1, Subpart 2.1 establish requirements that are consistent with those recommendations. Regulatory Position C.2 indicates that the requirements of the endorsed standard should be used during the operations phase "when applicable." This is addressed in Sections B.7 and B.16 of this QATR, which also establish any necessary exceptions or alternatives to the provisions of Subpart 2.1.

- Regulatory Guide 1.38, Revision 2, May 1977, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants," (ANSI N45.2.2-1972) – FPL substitutes NQA-1 1994, Subpart 2.2 for N45.2.2 in its commitment to Regulatory Guide 1.38. As noted in Regulatory Position C.1.a, other industry standards may be referenced; the commitment in this QATR to NQA-1, Subpart 2.2 includes commitment to those standards to the extent necessary to implement Subpart 2.2 requirements. If NRC guidance applies to those referenced standards, it is followed. Regulatory Position C.1.b modifies a provision of N45.2.2 such that the minimum load for dynamic testing to re-rate hoisting equipment for special lifts becomes 110% of the rated load. FPL takes exception to the Storage Areas section (6.2.4) of NQA-1 and commits to "the use or storage of food, drinks, and salt tablet dispensers in any storage area shall be controlled and be limited to designated areas where such use or storage is not deleterious to stored items". The Handling section (7) of NQA-1, Subpart 2.2 defers to the provisions of Subpart 2.15. FPL does not commit to Subpart 2.15, as there is no current NRC guidance regarding the other provisions of this part. For purposes of compliance to Regulatory Guide 1.38, Position C.1.b, FPL commits to follow the guidance as stated (see Section B.7). Regulatory Positions C.1.c, C.1.e, C.2.a, C.2.b, C.2.c, C.2.d and C.2.e recommend alterations to certain provisions of N45.2.2. The provisions of NQA-1, Subpart 2.2 establish requirements that are consistent with those recommendations. Regulatory Position C.1.d indicates that the requirements of the endorsed standard should be used during the operations phase "when applicable." This is addressed in Section B.7 of this QATR, which also establishes any necessary exceptions or alternatives to the provisions of Subpart 2.2.

A.7 Regulatory Commitments (Continued)

- Regulatory Guide 1.39, Revision 2, September 1977, "Housekeeping Requirements for Water-Cooled Nuclear Power Plants," (ANSI N45.2.3-1973) – FPL substitutes NQA-1 1994, Subpart 2.3 for N45.2.3 in its commitment to Regulatory Guide 1.39. As noted in Regulatory Position C.1, other industry standards may be referenced; the commitment in this QATR to NQA-1, Subpart 2.3 includes commitment to those standards to the extent necessary to implement Subpart 2.3 requirements. If NRC guidance applies to those referenced standards, it is followed. Regulatory Position C.2 indicates that the provisions of section 3.2.3 of N45.2.3 are not part of the Regulatory endorsement. As NQA-1, Subpart 2.3, section 3.2.3 has the same wording as N45.2.3, the Regulatory Position is applicable and will be followed in FPL's implementation of Subpart 2.3. Regulatory Position C.3 indicates that the endorsed standard is "applicable for housekeeping activities during the operations phase that are comparable to those occurring during construction." This is addressed in Section B.7 of this QATR that also establishes any necessary exceptions or alternatives to the provisions of Subpart 2.3.

- Regulatory Guide 1.54, Revision 0, June 1973, "Quality Assurance for Protective Coatings Applied to Nuclear Power Plants" (N101.4-1972) - Commitment to Regulatory Guide 1.54 is site specific, as required by the approved UFSAR/License at each FPL site.

- Regulatory Guide 1.94, Revision 1, April 1976, "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants," (ANSI N45.2.5-1974) – FPL substitutes NQA-1 1994, Subpart 2.5 for N45.2.5 in its commitment to Regulatory Guide 1.94; however, Subpart 2.5 includes requirements for soils and foundations which were not included in N45.2.5, and the commitment to Subpart 2.5 herein does not include commitment to those requirements. As noted in Regulatory Position C.1, other industry standards may be referenced; the commitment in this QATR to NQA-1, Subpart 2.5 includes commitment to those standards to the extent necessary to implement Subpart 2.5 requirements. If NRC guidance applies to those referenced standards, it is followed. Regulatory Position C.2 recommends using the general planning provisions of N45.2.5 in conjunction with Regulatory Guide 1.55, which has since been withdrawn; therefore, this position is no longer applicable. Regulatory Positions C.3 and C.4 recommend alterations to certain provisions of N45.2.5. The provisions of NQA-1, Subpart 2.5 are consistent with those recommendations. Applicability and use of Subpart 2.5 is addressed in Sections B.12 and B.16 of this QATR, which also establish any necessary exceptions or alternatives to the provisions of Subpart 2.5.

A.7 Regulatory Commitments (Continued)

- Regulatory Guide 1.116, Revision 0-R, May 1977, "Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems," (ANSI N45.2.8-1975) – FPL substitutes NQA-1 1994, Subpart 2.8 for N45.2.8 in its commitment to Regulatory Guide 1.116. As noted in Regulatory Position C.1, other industry standards may be referenced; the commitment in this QATR to NQA-1, Subpart 2.8 includes commitment to those standards to the extent necessary to implement Subpart 2.8 requirements. If NRC guidance applies to those referenced standards, it is followed. Regulatory Position C.3 recommends using section 5 of N45.2.8 in conjunction with Regulatory Guide 1.68 for pre-operational, cold functional, and hot functional testing. While section 5 of NQA-1, Subpart 2.8 provides the same requirements, it is anticipated that FPL plants, since they are already beyond these tests, will not need to implement Regulatory Guide 1.68. If testing in accordance with Regulatory Guide 1.68 becomes necessary, FPL will comply with the guidance of the Regulatory Guide 1.116 position. Regulatory Position C.2 indicates that the endorsed standard should be "followed for those applicable operations phase activities that are comparable to activities occurring during the construction phase." This is addressed in Sections B.12 and B.16 of this QATR, which also establish any necessary exceptions or alternatives to the provisions of Subpart 2.8.

- 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" (Position C.7) – FPL meets the intent of the quality assurance guidance cited in Position C.7. Compliance with the remainder of the [technical] positions of Regulatory Guide 1.143 is site specific, as addressed in each plant UFSAR.

- Regulatory Guide 1.152, Revision 1, January 1996, "Criteria for Digital Computers in Safety Systems of Nuclear Power Plants" – None of the current FPL plants were committed to this Regulatory Guidance during original construction. Regulatory Guide 1.152 may be used for plant modifications on a case by case basis, but this QATR makes no generic commitment thereto.

- Regulatory Guide 1.155, Revision 0, August 1988, "Station Blackout" (Position C.3.5) - FPL meets assurance guidance cited in Position C.3.5, Appendix A. Compliance with Appendix B and the remainder of the [technical] positions of Regulatory Guide 1.155 is site specific, as addressed in each plant UFSAR or License commitments.

- Generic Letter 89-02/EPRI-NP-5652 (March 1988, and supplements through March 1993) – FPL commits to compliance with the endorsed industry guidance regarding selection and qualification of commercial grade suppliers and dedication of commercial grade items for use in safety related applications.

A.7 Regulatory Commitments (Continued)

- Branch Technical Position CMEB 9.5-1, Revision 2, July 1981 (Positions C.2 and C.4) – FPL provisions for administrative controls for Fire Protection comply with site specific commitments, or with the provisions of Position C.2 of CMEB 9,5-1, Rev. 2, as specified in NRC approved site fire protection programs and the applicable NRC Safety Evaluation Reports. Application of the provisions of this QATR to fire protection activities provides elements of quality assurance that comply with site specific fire protection quality assurance commitments or with CMEB 9.5.1, Revision 2, Position C.4.

- Regulatory Guide 4.15, Revision 1, February 1979, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment" – FPL meets the intent of Regulatory Guide 4.15.

- Regulatory Guide 7.10, Revision 2, March 2005, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material" – FPL commits to implement the quality assurance guidance for activities related to the packaging and transport of radioactive material that are under its control. Quality Assurance for the design, fabrication and licensing of shipping containers is the responsibility of the container certificate holders.

- Regulatory Issue Summary 2000-18, October 2000, "Guidance on Managing Quality Assurance Records in Electronic Media" – In instances when FPL chooses electronic media storage as a means of maintaining required records, FPL will comply with the guidance of this Regulatory Issue Summary.

B. PERFORMANCE/VERIFICATION

B.1 Methodology

Personnel who work directly or indirectly for FPL are responsible for the achievement of acceptable quality in the work covered by this QATR. This includes design, engineering, procurement, manufacturing, construction, installation, start-up, maintenance, modifications, and operations. FPL personnel performing verification activities are responsible for verifying the achievement of acceptable quality. Activities governed by the QAP are performed as directed by documented instructions, procedures and drawings that are of a detail appropriate for the activity's complexity and effect on safety. Instructions, procedures and drawings specify quantitative or qualitative acceptance criteria as applicable or appropriate for the activity, and verification is against these criteria. Provisions are established to designate or identify the proper documents to be used in an activity, and to ascertain that such documents are being used.

B.2 Design Control

FPL has established and implements a program to control the design of items that are subject to the provisions of this QATR (see Section A.1). The program includes provisions to control design inputs, processes, outputs, changes, interfaces, records and organizational interfaces. These provisions assure that design inputs (such as design bases and the performance, regulatory, quality, and quality verification requirements) are correctly translated into design outputs (such as specifications, drawings, procedures, and instructions) such that the final design output can be related to the design input in sufficient detail to permit verification. The program defines the interface controls (internal and external between participating design organizations and across technical disciplines) necessary to control the development, review, approval, release, distribution and revision of design inputs and outputs.

FPL design processes provide for design verification (as described in Section B.3) that items and activities subject to the provisions of this QATR are suitable for their intended application, consistent with their effect on safety. Changes to final designs (including field changes) are subjected to these controls, which include measures commensurate with those applied to original plant design. Design changes and disposition of nonconforming items as "use as is" or "repair" are reviewed and approved by the responsible FPL design organization.

FPL maintains records sufficient to provide evidence that the design was properly accomplished. These records include the final design output and any revisions thereto, as well as record of the important design steps (e.g., calculations, analyses and computer programs) and the sources of input that support the final output.

In addition, temporary design changes (temporary modifications), such as temporary bypass lines, electrical jumpers and lifted leads, and temporary trip-point settings, are controlled by procedures that include requirements for appropriate installation and removal verifications and status tracking.

In establishing its program for design control, FPL commits to compliance with NQA-1, 1994, Basic Requirement 3, and Supplement 3S-1, Sections 1, 2, 3, 5, 6, and 7.

B. PERFORMANCE/VERIFICATION (CONTINUED)

B.3 Design Verification

The FPL design control program includes requirements for verifying the acceptability of design activities and documents, consistent with their effect on safety. This includes design inputs, design outputs and design changes. Design verification procedures are established and implemented to assure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria are identified, and the verification is satisfactorily accomplished and documented. Verification methods may include, but are not limited to, design reviews, alternative calculations and qualification testing. Testing used to verify the acceptability of a specific design feature demonstrates acceptable performance under conditions that simulate the most adverse design conditions expected for an item's intended use.

FPL completes design verification activities before the design outputs are used by other organizations for design work, and before they are used to support other activities such as procurement, manufacture or construction. When such timing cannot be achieved, the unverified portion of the design is identified and controlled such that, in all cases, the design verification is completed before relying on the item to perform its intended safety function.

The FPL design verification can be performed by the designer's immediate supervisor, provided (1) the supervisor did not specify a singular design approach or rule out certain design considerations and did not establish the design inputs used in the design, or (2) the supervisor is the only technically qualified individual capable of performing the verification, and (3) the need is individually documented and approved in advance by the supervisor's management. The frequency and effectiveness of the use of supervisors as design verifiers are independently verified to guard against abuse.

In establishing its program for design verification, FPL commits to compliance with NQA-1, 1994, Basic Requirement 3, and Supplement 3S-1, Section 4.

B.4 Procurement Control

FPL establishes and implements controls to assure that purchased items (components, spares 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. These controls include provisions such that:

- Where original technical or quality assurance requirements cannot be determined, an engineering evaluation is conducted and documented by qualified staff to establish appropriate requirements and controls to assure that interfaces, interchangeability, safety, form, fit and function, as applicable, are not adversely affected or contrary to applicable regulatory requirements.

B. PERFORMANCE/VERIFICATION (CONTINUED)

- Items are inspected (see Section B.12) and identified and stored (see Sections B.6 and B.7) to protect against damage, deterioration or misuse.

- Prospective suppliers of safety related items and services are evaluated to assure that only qualified suppliers are used. Qualified suppliers are periodically evaluated to assure they continue to provide acceptable products and services. Industry programs, such as those applied by ASME, NUPIC, or other established utility groups, are used as input or the basis for supplier qualification whenever appropriate. In addition, FPL commits to Position C.3.2 of Regulatory Guide 1.28, Revision 3, for auditing and evaluation of suppliers, with the exception that for position C.3.2.2, FPL will review the information described therein as it becomes available through its ongoing receipt inspection, operating experience, and supplier evaluation programs, in lieu of performing a specific evaluation on an annual basis. The results of the reviews are promptly considered for effect on a supplier's continued qualification and adjustments made as necessary (including corrective actions, adjustments of supplier audit plans, and input to third party auditing entities, as warranted). In addition, results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality requiring additional action. FPL considers that other 10CFR50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other state and federal agencies which provide items or services to FPL plants are not required to be evaluated or audited. FPL may apply a 90-day grace period to the 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 years plus 90 days.

- Applicable technical, regulatory, administrative, quality and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and 10CFR21) are invoked for procurement of items and services. Documentary evidence that an item conforms to these requirements is available at the site before relying on the item to perform its intended safety function. These documents are considered records according to Section B.15.

- Provisions are made for accepting purchased items and services, such as source verification, receipt inspection, pre- and post-installation tests, certificates of conformance, and document reviews. Acceptance actions are completed to ensure that procurement, inspection, and test requirements, as applicable, have been satisfied before relying on the item to perform its intended safety function.

- Controls are imposed for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt and acceptance of commercial grade or "off-the-shelf" items to assure they will perform satisfactorily in service in safety related applications.

B. PERFORMANCE/VERIFICATION (CONTINUED)

- 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.

In establishing controls for procurement, FPL commits to compliance with NQA-1, 1994, Basic Requirements 4 and 7, and Supplements 4S-1 and 7S-1, with the following exceptions:

- For Supplement 4S-1, Section 2.3, which requires procurement documents to require a quality program that complies with NQA-1, FPL may apply other nationally recognized and NRC endorsed quality standards, such as N45.2, as appropriate to the circumstances of the procurement, and may also elect to purchase items or services commercially available and then dedicate them for safety related service per Generic Letter 89-02/EPRI NP-5652.

- For Supplement 7S-1, Section 8.1, documentary evidence that items conform to procurement requirements need not be available at the site prior to item installation, but will be available at the site prior to placing reliance on the item for its intended safety function.

B.5 Procurement Verification

FPL establishes and implements measures to verify the quality of purchased items and services, whether purchased directly or through contractors, at intervals and to a depth consistent with the item's or service's importance to safety, complexity, quantity and the frequency of procurement. Verification actions include testing, as appropriate, during design, fabrication and construction activities associated with plant maintenance or modifications. Verifications occur at the appropriate phases of the procurement process, including, as necessary, verification of activities of suppliers below the first tier.

In establishing procurement verification controls, FPL commits to compliance with NQA-1, 1994, Basic Requirement 7 and Supplement 7S-1.

B.6 Identification and Control of Items

FPL establishes and implements provisions for the identification and control of items to prevent the use of incorrect or defective items. This includes controls for consumable materials and items with limited shelf life. The identification of items is maintained throughout fabrication, erection, installation and use so that the item can be traced to its documentation, consistent with the item's effect on safety. Identification locations and methods are selected so as not to affect the function or quality of the item.

B. PERFORMANCE/VERIFICATION (CONTINUED)

In establishing provisions for identification and control of items, FPL commits to compliance with NQA-1, 1994, Basic Requirement 8 and Supplement 8S-1.

B.7 Handling, Storage and Shipping

FPL establishes and implements provisions to control the handling, storage, shipping, cleaning and preservation of items to prevent inadvertent damage, loss or deterioration. These provisions include specific procedures, when required to maintain acceptable quality, for cleaning, handling, storage, packaging, shipping and preserving items important to safety. Items are appropriately marked and labeled during packaging, shipping, handling and storage to identify, maintain and preserve the item's integrity and indicate the need for special controls. Special controls (such as containers, shock absorbers, accelerometers, inert gas atmospheres, specific moisture content levels and temperature levels) are provided when required to maintain acceptable quality.

In establishing provisions for handling, storage and shipping, FPL commits to compliance with NQA-1, 1994, Basic Requirement 13 and Supplement 13S-1. FPL also commits to compliance with the requirements of NQA-1, 1994, Subpart 2.2, with the following exceptions:

- Subpart 2.2, Section 2.2 establishes criteria for classifying items into protection levels. Instead of classifying items into protection levels, FPL plants may establish controls for the packaging, shipping, handling and storage of such items on a case-by-case basis with due regard for the item's complexity, use, and sensitivity to damage. Prior to installation or use, the items are inspected and serviced as necessary to assure that no damage or deterioration exists which could affect their function.

- Subpart 2.2, Section 5.2.2 requires receiving inspections be performed in an area equivalent in environmental controls to those for the level of storage of the item. At FPL plants, receiving inspection area environmental controls may be less stringent than the storage environmental requirements for the item. Such inspections are performed in a manner and in an environment which does not endanger the required quality of the item.

- Subpart 2.2, Section 7.1 refers to Subpart 2.15 for requirements related to handling of items. The scope of Subpart 2.15 includes hoisting, rigging and transporting of items for nuclear power plants. This scope exceeds the scope of the NRC's original endorsement of ANSI N45.2.2 in Regulatory Guide 1.38, and establishes requirements for which there is no NRC regulatory position. In lieu of compliance with Subpart 2.15, FPL establishes and implements controls over hoisting, rigging and transport activities to the extent necessary to protect the integrity of the items involved, as well as potentially affected nearby structures and components. For re-rating of lifting equipment to allow "special lifts," FPL performs dynamic load testing over the full range of the lift using test loads at least 110% of the lift weight. Dynamic tests include raising, lowering, and traversing the load. Where required, FPL complies with applicable hoisting, rigging and transportation regulations and codes.

B. PERFORMANCE/VERIFICATION (CONTINUED)

Housekeeping practices during normal operations and maintenance activities, including refueling, are established to account for conditions or environments that could affect the quality of structures, systems and components within the plant. This includes control of cleanness of facilities and materials, fire prevention and protection, disposal of combustible material and debris, control of access to work areas, protection of equipment, radioactive contamination control and storage of solid radioactive waste. Housekeeping practices assure that only proper materials, equipment, processes and procedures are used and that the quality of items is not degraded as a result. Necessary procedures or work instructions, such as for electrical bus and control center cleaning, cleaning of control consoles, and radioactive decontamination are developed and used.

In addition, FPL commits to compliance with the requirements of NQA-1, 1994, Subpart 2.1, to establish appropriate provisions for the cleaning of fluid systems and associated components; and Subpart 2.3, to establish appropriate provisions for housekeeping; with the following exceptions:

- Subpart 2.1, Sections 3.1 and 3.2 establish criteria for classifying items into cleanness classes and requirements for each class. Instead of using the cleanness level system of Subpart 2.1, FPL plants may establish cleanness requirements on a case-by-case basis, consistent with the other provisions of Subpart 2.1. FPL establishes appropriate cleanliness controls for work on safety related equipment to minimize introduction of foreign material and maintain systems/component cleanliness throughout maintenance or modification activities, including documented verification of absence of foreign materials prior to system closure.

- Instead of the five-level zone designation in Subpart 2.3, FPL bases its control over housekeeping activities on a consideration of what is necessary and appropriate for the activity involved. The controls are effected through procedures or instructions that, in the case of maintenance or modification work, are developed on a case-by-case basis. Factors considered in developing the procedures and instructions include cleanliness control, personnel safety, fire prevention and protection, radiation control and security. The procedures and instructions make use of standard janitorial and work practices to the extent possible.

B. PERFORMANCE/VERIFICATION (CONTINUED)

B.8 Test Control

FPL establishes and implements testing programs to demonstrate that items subject to the provisions of this QATR will perform satisfactorily in service, that the plant can be operated safely and as designed, and that the coordinated operation of the plant as a whole is satisfactory. These programs include criteria for determining when testing is required, such as proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, inservice tests, and operational tests (such as surveillance tests required by Plant Technical Specifications), to demonstrate that performance of plant systems is in accordance with design intent. Programs also include provisions for establishing and adjusting test schedules and maintaining status for periodic or recurring tests. Tests are performed according to applicable procedures that include, consistent with the effect on safety, (1) instructions and prerequisites to perform the test, (2) use of proper test equipment, (3) acceptance criteria, and (4) mandatory verification points as necessary to confirm satisfactory test completion. Test results are documented and evaluated by the organization performing the test and reviewed by the appropriate authority having responsibility for the item being tested. If acceptance criteria are not met, retesting is performed as needed to confirm acceptability following correction of the system or equipment deficiencies that caused the failure.

In establishing provisions for testing, FPL commits to compliance with NQA-1, 1994, Basic Requirement 11 and Supplement 11S-1.

B.9 Measuring and Test Equipment Control

FPL establishes and implements provisions to control the calibration, maintenance, and use of measuring and test equipment, including installed plant instrumentation, that provide information important to safe plant operation. The provisions cover equipment such as indicating and actuating instruments and gages, tools, reference and transfer standards, and nondestructive examination equipment. The provisions assure that:

- Measuring and test equipment is calibrated at specified intervals on the basis of the item's required accuracy, intended use, frequency of use, and stability characteristics or other conditions affecting its performance. Alternatively, equipment may be calibrated immediately before and after use if a defined interval is not appropriate.

- Measuring and test equipment is labeled, tagged or otherwise controlled to indicate its calibration status and provide traceability to calibration test data or records.

- Calibrations are performed against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated. When this is not possible, the standards have an accuracy that ensures the equipment being calibrated will be within the required tolerance.

B. PERFORMANCE/VERIFICATION (CONTINUED)

- Where possible, calibration standards are traceable to appropriate national standards. Calibration standards have greater accuracy than the standards being calibrated, except where the same accuracy as the instruments being calibrated can be shown to be adequate for the service requirements.

- Measuring and test equipment found out of calibration is tagged or segregated and not used until it is successfully re-calibrated. An evaluation is performed to determine the acceptability of any items measured, inspected or tested with an out-of-calibration device from the time of the previous calibration.

In establishing provisions for control of measuring and test equipment, FPL commits to compliance with NQA-1, 1994, Basic Requirement 12, Supplement 12S-1 and Subpart 2.16 for establishing appropriate requirements for calibration and control of measuring and test equipment, including installed plant instrumentation, with the following exception:

- Section 5.5 of IEEE 498-85 (NQA-1, Subpart 2.16) requires all M&TE to be labeled. As stated above, FPL plants may not label certain M&TE, such as installed instrumentation, but provide other means of identification so appropriate controls can be implemented. This exception also applies to Section 7.2.1 of IEEE 336-85 (NQA-1, Subpart 2.4).

B.10 Inspection, Test and Operating Status

FPL establishes and implements measures to identify the inspection, test and operating status of items and components subject to the provisions of this QATR in order to maintain personnel and reactor safety and avoid unauthorized operation of equipment. Where necessary to preclude inadvertent bypassing of inspections or tests, or to preclude inadvertent operation, these measures require the inspection, test or operating status be verified before release, fabrication, receipt, installation, test or use. These measures also establish the necessary authorities and controls for the application and removal of status indicators or labels. Equipment control provisions for workmen's protection comply with applicable federal and state OSHA regulations.

In establishing measures for control of inspection, test and operating status, FPL commits to compliance with NQA-1, 1994, Basic Requirement 14.

B. PERFORMANCE/VERIFICATION (CONTINUED)

B.11 Special Process Control

FPL establishes and implements provisions to assure that special processes that require interim process controls to assure quality, such as welding, heat treating, chemical cleaning, and nondestructive examination, are controlled. These provisions include assuring that special processes are accomplished by qualified personnel using qualified procedures and equipment. Special processes are performed in accordance with applicable codes, standards, specifications, criteria or other specially established requirements. Special processes are those where the results are highly dependent on the control of the process or the skill of the operator, or both, and for which the specified quality cannot be fully and readily determined by inspection or test of the final product.

In establishing measures for the control of special processes, FPL commits to compliance with NQA-1. 1994, Basic Requirement 9 and Supplement 9S-1, as well as the applicable ASME Boiler and Pressure Vessel Code provisions established via 10CFR50.55a.

B.12 Inspection

FPL establishes and implements provisions for inspections to assure that items, services and activities affecting safety meet established requirements and conform to applicable documented instructions, procedures and drawings. Inspection may also be applied to items, services and activities affecting plant reliability. Types of inspections may include those verifications related to procurement, as discussed in Sections B.4 and B.5, such as source, in-process, final, and receipt inspection, as well as maintenance, modification, in-service, and operational activities. Inspections are carried out by properly qualified persons independent of those who performed or directly supervised the work.

Inspection planning (for those activities subject to inspection) identifies the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria and the organization responsible for performing the inspection. Inspection planning identifies required hold points, beyond which work is not to proceed without the consent of the inspection organization. Provisions for ASME Boiler and Pressure Vessel Code Authorized Inspections are included when required.

Inspection results are documented by the inspector and approved by authorized personnel. If acceptance criteria are not met, corrected areas are reinspected.

In establishing inspection requirements, FPL commits to compliance with NQA-1, 1994, Basic Requirement 10, Supplement 10S-1 and Subpart 2.4. In addition, for situations comparable to original construction, FPL commits to compliance with the requirements of Subparts 2.5 and 2.8 for establishing appropriate inspection requirements.

B. PERFORMANCE/VERIFICATION (CONTINUED)

B.13 Corrective Action

FPL establishes and implements provisions to assure that personnel have both the responsibility and authority to identify conditions adverse to quality, and the opportunity to suggest, recommend or provide solutions to resolve the condition. Provisions also include verification of resolution of significant issues (see also Section A.6).

Reworked, repaired and replacement items are inspected and tested to meet the original inspection or test requirements, or appropriately specified alternatives (see also Sections B.8 and B.12).

If evidence indicates that common components in safety related systems have performed unsatisfactorily, compensatory or corrective measures are planned prior to replacement or repair of such components. Replacement components receive adequate testing or are of a design for which experience indicates a high probability of satisfactory performance. Consideration is given to phased replacement to permit inservice performance to be evaluated and minimize the possibility of systemic failure.

In establishing provisions for corrective action and control of nonconforming items, FPL commits to compliance with NQA-1, 1994, Basic Requirements 15 and 16, and Supplement 15S-1.

B.14 Document Control

FPL establishes and implements provisions to specify the format and content (see Appendix B for procedures), and control the development, review, approval, issue, use and revision, of documents that specify quality requirements or prescribe activities affecting quality or safe operation to assure the correct documents are being employed. These provisions assure that specified documents are reviewed for adequacy, approved prior to use by authorized persons, and distributed according to current distribution lists and used at the location where the prescribed activity takes place. Procedures governing generating site activities (see Appendix B) are reviewed by qualified persons, other than the preparer, as designated by the Plant Manager. Such procedure reviews include determination whether additional cross-discipline reviews are required. Only safety related procedures, and procedures important to safety as used in 10CFR71 and 72, from the types listed in Appendix B (pages 41-44), require this review. Provisions include establishing levels of use, such as requiring the document to be present at the work location. Documents subject to control provisions include, but are not limited to, drawings (design, as-built), engineering documents (calculations, analyses, specifications, computer codes, Updated Final Safety Analysis Reports, Plant Technical Specifications), and procedures (administrative, operating, emergency operating, maintenance, calibration, surveillance, inspection, test). Other documents, such as those related to procurement, corrective actions, and assessments, are controlled as defined by the provisions and commitments cited in those sections of this QATR. Controlled copies of instructions and procedures are made available to and used by the persons performing the activity covered. New or revised controlled documents are made available in a timely fashion to support ongoing

B. PERFORMANCE/VERIFICATION (CONTINUED)

work and preclude use of incorrect information. Superseded documents are identified or removed from availability. Each site maintains documentation that describes how implementing documents are maintained to assure that QAP requirements are met and are not inadvertently removed in later revisions.

Revisions to controlled documents are reviewed for adequacy and approved for release by the same organization(s) as originally did so, or by other designated organizations that are qualified and sufficiently knowledgeable of the requirements and intent of the original document. FPL also establishes programmatic procedure preparation, review and usage controls that ensure procedures are technically and administratively correct. These controls ensure that procedures are reviewed when pertinent source material is revised (such as when Technical Specifications are revised), when unusual incidents occur, when plant modifications are made, and when significant deficiencies are identified. Procedures may also be reviewed because industry experience reviews, use during job execution or training, self-assessments or independent assessments identify deficiencies or opportunities for improvement. Revisions are made as necessary.

Temporary changes to approved procedures that do not change the intent are approved by two members of plant staff knowledgeable in the areas affected by the procedure. 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. Temporary changes are documented and, if appropriate, incorporated in the next revision of the procedure.

In establishing provisions for document control, FPL commits to compliance with NQA-1, 1994, Basic Requirement 6 and Supplement 6S-1.

B.15 Records

FPL establishes and implements provisions to ensure that sufficient records of items and activities affecting quality are generated and maintained to reflect completed work. Such records may include, but are not limited to, design, engineering, procurement, manufacturing, construction, inspection, test, installation, modification, operations, maintenance, corrective action, assessment, and associated reviews. The provisions establish requirements for records administration, including generation, receipt, preservation, storage, safekeeping, retrieval and final disposition. For activities governed by 10CFR71 or 72, these provisions address the specific requirements of sections 71.135 and 72.174.

B. PERFORMANCE/VERIFICATION (CONTINUED)

FPL uses the list of records in 10CFR71.135, 10CFR72.174, and Non-mandatory Appendix 17A-1, supplemented by the recommended retention times established in Regulatory Guide 1.28, Position C.2 (Table 1), to establish the types of records that will be created and retained in support of plant operation. Non-mandatory Appendix 17A-1 of NQA-1-1994 lists only those operations phase records having permanent (lifetime) retention; Regulatory Guide 1.28, Table 1, which provides for lifetime, 3, and 10 year (non-permanent) retention periods, does not specifically list operations phase record types. FPL establishes appropriate retention times for non-permanent operations phase records based on similarity to the same record types identified in Table 1 of Regulatory Guide 1.28. Thus, non-permanent records are designated for 3 or 10 year retention, as required by NQA-1-1994, Supplement 17S-1, Sections 2.7 and 2.8. In cases where local or state retention requirements are more restrictive than the regulatory guidance, the local requirements are met. In addition, when using optical or electronic records storage and retrieval systems, FPL complies with NRC guidance in RIS 2000-18. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records have lifetime retention.

In establishing provisions for records, FPL commits to compliance with NQA-1, 1994, Basic Requirement 17 and Supplement 17S-1, with the following exception:

- Supplement 17S-1, Section 4.2(b) requires records to be firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets or on shelving in containers. For hard-copy records maintained by FPL plants, the records are suitably stored in steel file cabinets or on shelving in containers, except that methods other than binders, folders or envelopes may be used to organize the records for storage.

B.16 Plant Maintenance

FPL establishes controls for the maintenance or modification of items and equipment subject to this QATR to ensure quality at least equivalent to that specified in original design bases and requirements, such that safety related structures, systems and components are maintained in a manner that assures their ability to perform their intended safety function(s). Maintenance activities (both corrective and preventive) are scheduled and planned so as not to unnecessarily compromise the safety of the plant. Permission to release equipment or systems for maintenance is granted by designated operating personnel who are responsible to verify that the equipment or system can be released and determine how long it may be out of service. This includes attention to the potentially degraded degree of protection when one subsystem of a redundant safety system has been removed for maintenance. Release is documented. When equipment is ready to be returned to service, operating personnel place the equipment in operation and verify and document its functional acceptability. In completing maintenance and restoring equipment, attention is given to restoration of normal conditions, such as removal of jumpers or signals used in maintenance or testing, or such as returning valves, breakers or switches to proper operating positions.

B. PERFORMANCE/VERIFICATION (CONTINUED)

In establishing controls for plant maintenance, FPL commits to compliance with NQA-1, 1994, Subpart 2.18, with the following exceptions:

- Section 2.3.a requires cleanliness during maintenance to be in accordance with Subpart 2.1. FPL commitment to Subpart 2.1 is described in Section B.7.

- Section 2.7 requires the application of Subparts 2.4, 2.5 and 2.8 for inspections of installation activities. FPL commitment to Subparts 2.5 and 2.8 is limited to activities comparable in nature and extent to those during original construction (see Section B.12). Inspections (verifications) of maintenance or modification activities are established, conducted and documented as required by Section B.12 to establish a suitable level of confidence in affected structures, systems, or components. The inspection criteria in Subparts 2.5 and 2.8 may be used in establishing required inspections for maintenance and minor modifications.

B.17 Computer Software Control

FPL establishes and implements provisions to assure that computer software used in applications affecting safety is prepared, documented, verified and tested, and used such that the expected output is obtained and configuration control maintained. To this end, FPL commits to compliance with the requirements of NQA-1 1994, Supplement 11S-2 and Subpart 2.7 to establish the appropriate provisions.

C. ASSESSMENT

C.1 Methodology

FPL establishes programs for reviews and assessments to verify that activities covered by this QATR are performed in compliance with the requirements established, review significant proposed plant changes or tests, verify that reportable events are promptly investigated and corrected, and detect trends which may not be apparent to the day-to-day observer. These programs are, themselves, reviewed for effectiveness as part of the overall assessment process, as described herein.

FPL uses self-assessment (performed by or for the group responsible for the activity being assessed) and independent assessment (performed by the Quality Assurance organization) to monitor overall performance, identify anomalous performance and precursors of potential problems, and verify satisfactory resolution of problems. Persons responsible for carrying out these assessments are cognizant of day-to-day activities such that they can act in a management advisory function with respect to the scope of the assessment. Both self-assessments and independent assessments are accomplished using instructions or procedures that provide detail commensurate with the assessed activity's complexity and importance to safety.

FPL plants maintain on-site review groups to review overall plant performance and advise site management on matters related to nuclear safety. Appendix A establishes the requirements for these committees.

FPL periodically performs independent reviews of matters involving the safe operation of its fleet of nuclear power plants, with a minimum of one such review being conducted for each generating site each year. The review addresses matters that plant and corporate management determine warrant special attention, such as plant programs, performance trends, employee concerns, or matters related to safe plant operations. The review is performed by a team consisting of personnel with experience and competence in the activities being reviewed, but independent (from cost and schedule considerations) from the organizations responsible for those activities. The review is supplemented by outside consultants or organizations as necessary to ensure the team has the requisite expertise and competence. Results are documented and reported to responsible management.

In establishing the independent assessment program, FPL commits to compliance with NQA-1, 1994, Basic Requirement 18 and Supplement 18S-1, with the following clarification:

- The term "audit" and "independent assessment" are synonymous and can be used interchangeably.

C. ASSESSMENT (CONTINUED)

C.2 Self-assessment

FPL uses self-assessments performed by or for the group responsible for the activity being assessed to identify anomalous performance and precursors of potential problems. When line organizations perform self-assessments, their focus is technically and performance oriented with focus on the quality of the end product as well as on compliance with procedures and processes. The objective of self-assessment is to verify compliance, improve performance and achieve excellence. Results of self-assessments are reported in an understandable form and in a timely fashion to a level of management having the authority to effect corrective action and verify satisfactory resolution of problems.

C.3 Independent Assessment

FPL has established a program of planned and periodic performance-based independent assessments to monitor overall performance and confirm that activities affecting quality comply with the QAP and that the QAP is effectively implemented. The organization performing independent assessment (Quality Assurance) is technically and performance oriented, with its focus on the quality of the end product and the effective implementation of procedures and processes. Persons performing independent assessments do not have direct responsibility for any area being assessed, and do not report to a management position with immediate responsibility for the activity being assessed. FPL assessment resources may be supplemented with technical specialists as needed.

The independent assessment program provides comprehensive independent evaluations of activities and procedures. Planning for independent assessments identifies the characteristics and activities to be assessed and the relevant performance and/or acceptance criteria. As appropriate to the scope of an assessment, these criteria include related plant Technical Specification requirements. Independent assessments are then conducted using these predetermined criteria. Scheduling and resource allocation for independent assessments are based on the status, performance, and effect on safety of the activity or process (topic) being assessed. Scheduling is dynamic to provide for response to developing performance issues and resources are supplemented as necessary when QAP effectiveness is in question. Activities having immediate effect on safety, such as operations or maintenance, are independently assessed on a routine basis.

Other topics, as identified in Table 1, where performance metrics, corrective action history and effectiveness, process/personnel stability, self-assessments, and response to operating experience provide sufficient evidence of satisfactory performance, may receive less frequent independent assessment attention, while topics with recent process/personnel changes or unsatisfactory or declining performance trends receive more frequent assessments. A Quality Assurance expert panel documents the bases for its decisions regarding which topics (from Table 1) receive independent assessment at what frequency, such that activities covered by Table 1, are reviewed annually as candidates for independent assessment. Annual review documentation is retained as a quality record according to Section B.15 and will be available for NRC review.

C. ASSESSMENT (CONTINUED)

In the event the expert panel review process is not used to determine frequencies, the topics in Table 1 are audited as a minimum of biennially. A 90-day grace period may be applied to this periodicity. 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 two years year plus 90 days.

Certain activities, as identified in Table 2, receive independent assessments at frequencies established by related NRC rules. In addition, independent assessments include examination of selected procedures to verify that the procedure review and revision controls of Section B.14 are effectively implemented.

Results of independent assessments are reported in an understandable form and in a timely fashion to a level of management having the authority to effect corrective action. Quality Assurance conducts timely follow-up action, including re-assessment of deficient areas, as necessary, to establish adequacy of corrective actions.

Independent assessment results are documented and reviewed by Quality Assurance management and by management having responsibility for the area assessed. In addition, Quality Assurance activities are periodically assessed for effectiveness. Results are documented and reported to responsible management.

Quality Assurance provides for assessment of work carried out under the requirements of the QAP that is delegated to other (non-FPL) entities.

Table 1
Topics Subject to Performance-based Independent Assessment Considerations

Topic***	Primary 10CFR50, Appendix B Criteria*
Engineering & Configuration Management • Modifications • System Engineering • Accident Analysis • Core Design	III – Design Control IX – Control of Special Processes
Procurement & Nuclear Materials Management	IV – Procurement Document Control VII – Control of Purchased Material, Equipment and Services VIII – Identification and Control of Materials, Parts and Components XIII – Handling, Storage and Shipping XV - Nonconforming Materials, Parts, and Components
QA Programs • Organization • On-Site Review Groups • Procedures • Licensing • QA Records • Document Control	VI – Document Control XVII – Quality Assurance Records
Inspection/Quality Verification • Quality Control • In-service Inspection • Nondestructive Examination	IX – Control of Special Processes X – Inspection XIV – Inspection, Test and Operating Status XV – Nonconforming Materials, Parts and Components
Corrective Action Program & Self-Assessment	XVI – Corrective Action

Table 1
Topics Subject to Performance-based Independent Assessment Considerations
(Continued)

Topic***	Primary 10CFR50, Appendix B Criteria*
Independent Evaluation of QA/QC • Quality Assurance Programs • QC Inspection • Independent Assessment	II – Quality Assurance Program X – Inspection XVIII – Audits
Training/Qualification • Operator Training • Technical/Support Staff Training • Staff Qualifications	II – Quality Assurance Program
Operations • Plant Operations** • Equipment Control • Refueling	XI – Test Control XII – Control of Measuring and Test Equipment XIV – Inspection, Test and Operating Status
Maintenance** • Preventive • Corrective • Planning/Scheduling	VIII – Identification and Control of Materials, Parts and Components IX – Control of Special Processes XI – Test control XII – Control of Measuring and Test Equipment XIII – Handling, Storage and Shipping XIV – Inspection, Test and Operating Status XV – Nonconforming Materials, Parts and Components
Radiological Protection • Environmental Monitoring • Radiation Protection • Radioactive Waste Control • Radiological Environmental Monitoring/Environmental Protection • Industrial Radiation Safety	N/A – (10CFR71, Subpart H)
Chemistry & Effluents	N/A

Table 1
Topics Subject to Performance-based Independent Assessment Considerations
(Continued)

Topic***	Primary 10CFR50, Appendix B Criteria*
Nuclear Information Management • Software Quality Assurance	III – Design Control XI – Test Control

* The identified criteria are the ones primarily controlling important aspects of the activity. Other criteria have general applicability to nearly all activities, such as Criterion I, V, VI, XVI and XVII, and are therefore not listed for each topic.

** Subject to assessment on a routine basis.

*** Topic titles in this table may vary, however, all program elements listed will be covered.

Table 2
Topics Subject to Regulatory-related Independent Assessment Frequencies

Topic	Frequency	Basis
Emergency Planning*	Annual	10CFR50.54(t)
Fitness for Duty	Annual	10CFR26.80
Access Authorization (Contractor Programs)	Biennial Annual	10CFR73.56(g)
Site Security*	Annual	10CFR73.55(g)(4)
Fire Protection • Prevention, Detection and Response • Alternate Shutdown Capability	Biennial (Includes use of a non-site, qualified fire protection specialist on a triennial basis)	NRC Administrative Letter 95-06

- May be extended up to two years based upon performance data.

APPENDICES

Appendix A: On-Site Review Group

1.0 General

The On-Site Review Group (ORG) is responsible to the plant manager for advice on all plant-related matters concerning nuclear safety. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records are identified in implementing procedures. A general description of these areas is included below.

(Note: Each plant may name this on-site review group function differently. Regardless of the name, these requirements are met.)

In discharging its review responsibilities, the ORG shall keep safety considerations paramount when opposed to cost or schedule considerations. Should a voting member at a particular meeting have direct responsibility for an item under review where a conflict of such considerations is likely, that member shall be replaced (to fill the quorum) by another voting member not having such potential conflict.

2.0 Composition

The ORG is comprised of a minimum number of members as designated by the plant manager and detailed in implementing procedures. All members are qualified in accordance with implementing procedure requirements that meet site Technical Specifications. Membership includes representation from at least the following disciplines: Operations, Maintenance, Engineering, Radiation Protection and Chemistry. The ORG collectively has, or has access to, the experience and competence necessary to review the areas of (1) nuclear power plant operations, (2) nuclear engineering, (3) chemistry and radiochemistry, (4) metallurgy, (5) nondestructive testing, (6) instrumentation and control, (7) radiological safety, (8) mechanical and electrical engineering, (9) administrative controls and quality assurance practices, and (10) other fields associated with the unique characteristics of the plant. Consultants may be utilized to provide expert advice as needed.

Alternate chairmen and members may be appointed by the plant manager to serve on a permanent or temporary basis.

3.0 Meetings

The ORG meets commensurate with the scope of activities, but minimal frequency requirements are specified in procedures.

Rules for a quorum are established and adhered to. However, no more than a minority of alternates may participate as voting members at any one time.

Appendix A: On-Site Review Group (Continued)

4.0 Review

The ORG reviews at least the following:

(1) The Offsite Dose Calculation Manual (OCDM) and the Process Control Program (PCP).

(2) Proposed tests or experiments that affect nuclear safety.

(3) Proposed changes or modifications to plant systems or equipment that affect nuclear safety.

(4) Written 10CFR50.59/72.48 evaluations to verify that changes to the facility or procedures, tests or experiments do not involve a change in the Technical Specifications or require prior NRC review.

(5) Proposed changes to Operating License and Technical Specifications.

(6) Reports covering violations of applicable NRC statutes, codes, regulations, orders, Technical Specifications, or license requirements.

(7) Reports of special reviews and investigations as requested by the Site Vice President, Site Director, or plant manager.

(8) Events reportable in writing to the NRC according to applicable regulations.

(9) Any other matter related to nuclear safety requested by the Site Vice President, Site Director or plant manager, selected by ORG members, or referred to the ORG by other site or corporate organizations.

(10) Reports of significant operating abnormalities or deviations from the normal and expected performance of plant equipment or systems that affect nuclear safety.

Reviews of Items (6) through (10) include results of any investigations made and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

Appendix A: On-Site Review Group (Continued)

5.0 Authority

The ORG:

- Recommends in writing to the plant manager approval or disapproval of items reviewed.
- Renders determinations in writing with regards to whether Items (1) through (5), or changes thereto, require prior NRC approval in accordance with 10CFR50.59/72.48.
- Provides written notification to level(s) above the plant manager of any disagreements between the ORG and the plant manager.

The ORG shall advise the plant manager on matters related to safe operation and overall performance. The ORG has authority to obtain access to records and personnel as needed to conduct reviews.

In carrying out its review responsibilities, the ORG may establish subcommittees or use designated organizational units to carry out the review. The subcommittees or organizational units must regularly report results of reviews for full committee consideration and may recommend items for full committee review as warranted.

6.0 Records

The ORG maintains written minutes of each ORG meeting, to include identification of items reviewed, and decisions and recommendations of the Committee. Copies of the minutes are provided to the on-site and off-site management position(s) above the plant manager, and to other management responsible for the areas reviewed as necessary. ORG records are retained according to Section B.15.

Appendix B: Procedures

FPL uses procedures to provide an approved, preplanned method of conducting activities affecting safety. As stated in Position C.1 of Regulatory Guide 1.33, Revision 2, FPL commits to use Appendix A of Regulatory Guide 1.33 as guidance for establishing the types of procedures that are necessary to control and support plant operation. Procedures are sufficiently detailed for a qualified individual to perform the required function without direct supervision, but may not provide a complete description of the system or plant process.

Guidance is established to identify the manner in which procedures are to be implemented, including identification of those tasks that require (1) the written procedure to be present and followed step by step while the task is being performed, (2) the user to have committed the procedure steps to memory, (3) verification of completion of significant steps, as by initials or signatures or use of check-off lists. Procedures that are required to be present and referred to directly are those developed for extensive or complex jobs where reliance on memory cannot be trusted, tasks that are infrequently performed, and tasks where steps must be performed in a specified sequence. When documentation of an action is specified, the necessary data is recorded as the task is performed.

The format of procedures may vary from plant to plant within FPL; however, procedures include the following elements, as appropriate to the purpose or task covered. These elements are not intended to imply a specific format is required:

Title/Status: Each procedure is given a title descriptive of the work or subject it addresses, and includes a revision number and/or date and an approval status.

Purpose/Statement of Applicability: The purpose for which the procedure is intended is clearly stated (if not clear from the title).

References: Applicable references, including reference to appropriate Technical Specifications, are included. References are included within the body of the procedure when the sequence of steps requires other tasks to be performed (according to the reference) prior to or concurrent with a particular step.

Prerequisites: Identifies those independent actions or procedures that must be accomplished and plant conditions which must exist prior to performing the procedure. A prerequisite applicable to only a specific portion of a procedure is so identified.

Precautions: Alert the user to those important measures to be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation during performance of the procedure. Cautionary notes applicable to specific steps are included in the main body of the procedure and are identified as such.

Limitations and Actions: Limitations on the parameters being controlled and appropriate corrective measures to return the parameter to the normal control band are specified.

Appendix B: Procedures (Continued)

Main Body: Contains the step-by-step instructions in the degree of detail necessary for performing the required function or task.

Acceptance Criteria: The quantitative or qualitative criteria against which the success or failure (as of a test-type activity) of the step or action would be judged.

Check-off Lists: Complex procedures use check-off lists (aka checklists) which may be included as part of the procedure or appended to it.

Certain types of procedures governing generating site activities are common to all plants. Individual plant terminology may vary from the following, and some procedure types may be combined. Sufficent procedures are maintained to provide appropriate direction for these activities. In amplification to the appropriate elements above, such procedures are further defined as follows:

Calibration and Test Procedures: Contain instructions for periodic calibration and testing of safety related instrumentation and control systems, and for periodic calibration of measuring and test equipment used in activities affecting the quality of these systems. These procedures provide for meeting surveillance requirements and for assuring measurement accuracy adequate to keep safety related parameters within operational and safety limits.

Chemical-radiochemical Control Procedures: Contain instructions for chemical and radiochemical activities such as the nature and frequency of sampling and analyses; maintaining coolant quality within prescribed limits; limitations on concentrations of agents that could cause corrosive attack, foul heat transfer surfaces or become sources of radiation hazards due to activation; control, treatment and management of radioactive wastes and control of radioactive calibration sources, including shipping.

Emergency Plan Implementing Procedures: Contain instructions for activating the Emergency Response Organization and facilities, protective action levels, organizing emergency response actions, establishing necessary communications with local, state and federal agencies, and for periodically testing the procedures, communications and alarm systems to assure they function properly. Format and content of such procedures are such that requirements of each site's NRC approved Emergency Plan are met.

Emergency Procedures: Contain instructions for response to potential emergencies so that a trained operator will know in advance the expected course of events that will identify an emergency and the immediate actions that should be taken in response. Format and content of emergency procedures are based on regulatory and Owner's Group(s) guidance that identify potential emergency conditions and generally require such procedures to include a title, symptoms to aid in identification of the nature of the emergency, automatic actions to be expected from protective systems, immediate operator actions for operation of controls or confirmation of automatic actions, and subsequent operator actions to return the reactor to a normal condition or provide for a safe extended shutdown period under abnormal or emergency conditions.

Appendix B: Procedures (Continued)

Fuel Handling Procedures: Contain instructions for core alterations, accountability of fuel and partial or complete refueling operations that include, for example, continuous monitoring of neutron flux throughout core loading, periodic data recording, audible annunciation of abnormal flux increases, and evaluation of core neutron multiplication to verify safety of loading increments. Procedures are also provided for receipt and inspection of new fuel, and for fuel movements in the spent fuel storage areas. Fuel handling procedures include prerequisites to verify the status of systems required for fuel handling and movement; inspection of replacement fuel and control rods; designation of proper tools, proper conditions for spent fuel movement, proper conditions for fuel cask loading and movement; and status of interlocks, reactor trip circuits and mode switches. These procedures provide requirements for refueling, including proper sequence, orientation and seating of fuel and components, rules for minimum operable instrumentation, actions for response to fuel damage, verification of shutdown margin, communications between the control room and the fuel handling station, independent verification of fuel and component locations, criteria for stopping fuel movements, and documentation of final fuel and component serial numbers and locations.

Maintenance Procedures: Contain instructions in sufficient detail to permit maintenance work to be performed correctly and safely, and include provisions for conducting and recording results of required inspections or tests. Appropriate referencing to other procedures or vendor manuals is provided. Instructions are also provided, although not necessarily in Maintenance Procedures, for equipment removal and return to service, and appropriate radiation protection measures (such as protective clothing and radiation monitoring).

Power Operation and Load Changing Procedures: Contain instructions for steady-state power operation and load changing that include provisions for use of control rods, chemical shim, coolant flow channel control, or for any other system available for short- or long-term control of reactivity, making deliberate load changes and adjusting operating parameters.

Process Monitoring Procedures: Contain instructions for monitoring performance of plant systems to assure that core thermal margins and coolant quality are maintained in acceptable status at all times, that integrity of fission product barriers is maintained, and that engineered safety features and emergency equipment are in a state of readiness to keep the plant in a safe condition if needed. Maximum and minimum limits for process parameters are appropriately identified.

Radiation Control Procedures: Contain instructions for implementation of program requirements necessary to meet regulatory commitments, including acquisition of data and use of equipment to perform necessary radiation surveys, measurements and evaluations for the assessment and control of radiation hazards. These procedures provide requirements for monitoring both external and internal exposures of employees, utilizing accepted techniques; routine radiation surveys of work areas; environmental monitoring in the vicinity of the plant; radiation monitoring of maintenance and special work activities, and for maintaining records demonstrating the adequacy of measures taken to control radiation exposures to employees and others.

Appendix B: Procedures (Continued)

Shutdown Procedures: Contain instructions for operations during controlled shutdown and following reactor trips, and include instructions for establishing or maintaining hot standby or cold shutdown conditions, as applicable. The major steps involved in shutting down the plant are specified, including instructions for such actions as monitoring and controlling reactivity, load reduction, cooldown rates, activating or deactivating equipment, and provisions for decay heat removal. Check-off lists are used, as appropriate, for confirming completion of major steps in proper sequence.

Start-up Procedures: Contain instructions for starting the reactor from cold or hot conditions and establishing power operation. This includes documented determination that prerequisites have been met, including confirmation that necessary instrumentation is operable and properly set; necessary system procedures, tests and calibrations have been completed; and required approvals have been obtained. The main body includes the major steps of the start-up sequence, including reference to appropriate systems procedures. Start-up procedures contain check-off lists where appropriate.

System Procedures: Contain instructions for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation and other instructions appropriate for operations of systems related to the saftey of the plant. Separate procedures may be developed for correcting off-normal conditions for those events where system complexity may lead to operator uncertainty. System procedures contain check-off lists where appropriate.

Test and Inspection Procedures: Contain the objectives, acceptance criteria, prerequisites for performing the test or inspection, limiting conditions, and appropriate instructions for performing the test or inspection. These procedures also specify any special equipment or calibrations required to conduct the test or inspection and provide for appropriate documentation and evaluation by responsible authority to assure test or inspection requirements have been satisfied. Where necessary, hold or witness points are identified within the procedures and require appropriate approval for the work to continue beyond the designated point. These procedures provide for recording the date, identification of those performing the test or inspection, as-found condition, corrective actions performed (if any), and as-left condition, as appropriate for the subject test or inspection.

While not specifically a procedure type, **Temporary Procedures** may be used to direct operations during testing, refueling, maintenance and modifications; to provide guidance in unusual situations not within the scope of normal procedures; and to insure orderly and uniform operations for short periods when the plant, a system, or a component of a system is performing in a manner not covered by existing detailed procedures, or has been modified or affected in such manner that portions of existing procedures do not apply. Temporary Procedures include designation of the period of time during which they may be used.

Appendix C: Definitions

FPL uses the definitions of terms as provided in Section 4 of the Introduction of NQA-1 1994 in interpreting the requirements of NQA-1 and other standards to which the QATR commits. In addition, definitions are provided for the following terms not covered in NQA-1:

Administrative Controls: Rules, orders, instructions, procedures, policies, practices and designations of authority and responsibility.

Emergency Procedures: See Appendix B.

Experiments: performance of plant operations carried out under controlled conditions in order to establish characteristics or values not previously known.

Independent Assessment: Planned and documented activity performed to determine by investigation, examination, observation, or evaluation of objective evidence the adequacy of and compliance with established procedures, instructions, drawings, and other applicable documents, and to determine the effectiveness of implementation. Independent Assessment, as used in this QATR, is considered equivalent to the term "audit".

Maintenance and Modification Procedures: Written procedures defining the policies and practices by which structures, mechanical, electrical and instrumentation and control systems, and components thereof, are kept in a condition of good repair or efficiency so that they are capable of performing their intended functions.

Nuclear Power Plant: Any plant using a nuclear reactor to produce electric power, process steam or space heating.

Off-normal Condition Procedures: Written procedures which specify operator actions for restoring an operating variable to its normal controlled value when it departs from its range, or to restore normal operating conditions following a perturbation. (May be called Abnormal, Off-normal or other terms conveying the same intent.)

On-site Operating Organization: On-site personnel concerned with the operation, maintenance and certain technical services.

Operating Activities: Work functions associated with normal operation and maintenance of the plant, and technical services routinely assigned to the on-site operating organization.

Operating Procedures: Written procedures defining the normal methods, means and limits of operation of the nuclear power plant, a plant system or systems, or processes, including actions to be taken by operating personnel for removal from and return to service equipment on which maintenance is to be or has been performed.

Appendix C: Definitions (Continued)

Operational Phase: That period of time during which the principal activity is associated with normal operation of the plant. This phase of plant life is considered to begin formally with commencement of initial fuel loading and ends with plant decommissioning.

Quality Instruction: Any instruction or procedure that defines programmatic controls needed to implement the Quality Assurance Topical Report. These instructions and procedures consist of documents specifically identified as "Quality Instructions" and other equivalent administrative procedures and instructions. Quality Instructions do not include lower tier work procedures or instructions where the QA program controls are contained in other documents. For example, Quality Instruction includes the plant procedure or instruction that defines the programmatic requirements for control of M&TE but not the procedure for calibrating a particular piece of M&TE.

Quality Related: This classification is applied to selected equipment, components, structures and services designed to support and/or protect the safety function of safety related equipment. Quality Assurance Program elements are applied with a graded approach to quality to an extent that is commensurate with the item is importance to safety. Implementing documents establish program element applicability.

These include activities those items or related services that are not safety related and are in one or more of the following categories:

1. Equipment, components and structures designed to meet seismic requirements or whose failure could:

   (a) damage safety related equipment such that the equipment would be prevented from performing its safety function, or

   (b) result in releases exceeding the exposure guidelines of the Offsite Dose Calculation Manual.

2. Fire protection equipment:

   (a) required to protect safety related equipment, or

   (b) whose failure could result in water damage to safety related equipment which could prevent the equipment from performing its safety function, or

   (c) required to maintain the integrity of a fire barrier necessary to protect safety related equipment.

3. A partial or total loss of function of a radioactive confinement system that could result in an accidental, unplanned, or uncontrolled release of radioactivity exceeding the Offsite Dose Calculation Manual limits.

Appendix C: Definitions (Continued)

4. Equipment whose failure under normal operating conditions or an anticipated transient, results in:

   (a) exceeding a safety limit specified in the Technical Specifications, or

   (b) initiation of a UFSAR Design Basis Accident, or

   (c) the reactor coolant system not being in a controlled or design condition while operating or shutdown.

5. Instrumentation, equipment, components, or structures required to be operable by the Technical Specifications.

6. Instrumentation that is essential to preventing or monitoring release of radioactive material to the environment which could exceed the guidelines of the Offsite Dose Calculation Manual.

Review: A deliberately critical examination, including observation of plant operation, evaluation of assessment results, procedures, certain comtemplated actions, and after-the-fact investigations of abnormal conditions.

Supervision: Direction of personnel activities or monitoring of plant functions by an individual responsible and accountable for the activities they direct or monitor.

Surveillance Testing: Periodic testing to verify that safety related structures, systems and components continue to function or are in a state of readiness to perform their functions, and to provide assurance that failures or substandard performance do not remain undetected and that the required reliability of safety related systems is maintained. Such functions include keeping parameters within normal bounds or acting to put the plant in a safe condition if they exceed normal bounds.

System: An integral part of nuclear power plant comprising components which may be operated or used as a separate entity to perform a specific function.

Appendix D: Revision Summaries

Revision/Section	Change/Reason for Change	Basis for Meeting 10CFR50-B
Revision 0, 01/03/06	New Program	NRC SE dated .....

ENCLOSURE 2

FLORIDA POWER AND LIGHT COMPANY,
FPL ENERGY DUANE ARNOLD, LLC
AND FPL ENERGY SEABROOK, LLC

ST. LUCIE UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251
SEABROOK STATION
DOCKET NO. 50-443
DUANE ARNOLD ENERGY CENTER
DOCKET NO. 50-331

FEBRUARY 15, 2006

EXISTING SITE QA PROGRAMS VERSUS QATR COMPARISON MATRICES

259 PAGES FOLLOW

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Policy Statement	Policy Statement	N	Note 2 – Proposed program includes the words "Quality Related" when referring to equipment and activities in which the QAP is also applied.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Approval Page	Approval Page	R - #1	FPLEDA-1 has the Senior Vice President Nuclear Division & Chief Nuclear Officer and the Director Nuclear Assurance approve the QATR. The proposed program is approved by the Director Nuclear Assurance.	This is justified based on Paragraph 17.3.II.A.1 of NUREG-0800 that requires the policy statement to be approved by upper management and on Paragraph 17.3.II.A.2.e(3) that requires the responsibility for the QA program to be established. These also meet Criteria I, II and VI of 10 CFR50, Appendix B insofar as an appropriate quality assurance program is established and the documents are approved by authorized personnel.

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Table of Contents	Table of Contents		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Introduction	Introduction	i -#i	The proposed program contains additional words to clarify the extent of applicability of the QATR. These include such words as "... meets the requirements of Regulatory Guides and Industry Standards referenced in Section A.7 of this report. The Topical Quality Requirements and attached Policy Statement, together with Quality Instructions document the Program and the FPL policy with regard to Quality Assurance. This Program shall apply to Duane Arnold Nuclear Plant, Seabrook Station, St. Lucie Nuclear Plant, and Turkey Point Nuclear Plant..." and "The requirements of the FPL Quality Assurance Program shall apply to nuclear safety related structures, systems, and components as identified in the Safety Analysis Report for each nuclear unit. Additionally, the requirements of the FPL Quality Assurance Program shall apply to all FPL, contractor, or consultant organizations performing activities affecting the quality of safety related structures, systems, and components of FPL nuclear power plants. Portions of the FPL Quality Assurance Program requirements are also applicable to Quality Related items and	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
			services. Those portions applicable to specific Quality Related items or services shall be delineated in appropriate instructions.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A. Management	A. Management			
A.1 Methodology	A.1 Methodology	N	Note 3 – FPLEDA-1 includes more details on the types of procedures and the procedure hierarchy, whereas the proposed program uses the words "Quality instructions" to cover such documents as Corporate Directives, Fleet Procedures, etc.	
		R - #2	Current program states that the Chief Nuclear Officer will approve QATR revisions, the proposed program states that this will be done by the Director Nuclear Assurance.	This is justified based on Paragraph 17.3.II.A.1 of NUREG-0800 that requires the policy statement to be approved by upper management and on Paragraph 17.3.II.A.2.e(3) that requires the responsibility for the QA program to be established. These also meet Criteria I, II and VI of 10 CFR50, Appendix B insofar as an appropriate quality assurance program is established and the documents are approved by authorized personnel.

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A.2 Organization	A.2 Organization		None	
A.2.1 Corporate Organization	A.2.1 Corporate Organization	N	Note 3 – The proposed program and FPLDEA-1 describe different levels of organization and utilize different titles. For example, the current program uses the term Vice Presidents, whereas the proposed program is more specific in defining titles such as Vice President Nuclear Operations, Vice President Nuclear Operations Support, Vice President Nuclear Engineering, etc.	
A.2.2 Site Organization	A.2.2 Site Organization	N	Note 3 - The FPLEDA-1 words of "Some titles and reporting relationships may vary, but in all cases there is a designated position to carry out the defined responsibilities" are not in the proposed program.	
		N	Note 3 – Titles, reporting relationships, and responsibilities vary from FPLDEA-1 to the proposed program. For example, FPLDEA-1 has the Plant Manager report to the Director Site Operations whereas the proposed program has the relationship to the Site Vice President.	
		N	Note 4 - The Director Site Operations and Business Support	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
			Manager are not in the proposed program.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A.3 Responsibility	A.3 Responsibility		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A.4 Authority	A.4 Authority		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A.5 Personnel Training and Qualification	A.5 Personnel Training and Qualification	N	Note 3 – When referring to where staff minimum requirements are delineated, words "or other appropriate documents" are in the proposed program but not in FPLEDA-1. Also, the word "plant" has been inserted before Technical Specifications in the proposed program but not FPLEDA-1.	
		R - #3	The proposed program allows for a 90-day grace period for annual evaluations for lead auditor proficiency.	FPL takes exception to Sections 4.1 and 6.3 of Supplement 2S-3 concerning a grace period for the documented annual evaluation of lead auditors. This meets Criterion XVIII of 10 CFR 50, Appendix B insofar as audits are performed by appropriately trained personnel. (Reference FPL TQAR Appendix C). Also reference NRC letter from G.S. Vissing to R.C. Mecredy, RG&E, dated July 22, 1998. The additional requirement of the SER that "in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days" is covered by the FPL QATR.

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A.6 Corrective Action	A.6 Corrective Action	N	Note 3 - FPLEDA-1 includes the words "documented and" when referring to the reporting of significant conditions adverse to quality. The proposed program states that these should be reported without stating that they should be documented. This is not a reduction in accordance with 10 CFR 50.54(a)(3)(ii).	
		N	Note 3 – When detailing requirements for review and acceptance prior to installation, FPLEDA-1 includes the words "items, services or activities" whereas proposed program only uses term "items". Note: This is consistent with Criteria XIV and XV of 10 CFR 50, Appendix B, which are limited to items.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
A.7 Regulatory Commitments	A.7 Regulatory Commitments			
• Safety/Regulatory Guide 1.29, Revision (site specific) "Seismic Design Classification" – FPLE Duane Arnold was designed, constructed and licensed based on criteria available prior to this Regulatory Guide being issued. The specific design criteria and seismic designations are reflected in the plant's UFSAR, and in other docketed analysis. Thus, the commitment to Safety/Regulatory Guide 1.29 is as required by the approved UFSAR/License for FPLE Duane Arnold.	• Safety/Regulatory Guide 1.29, Revision (site specific) "Seismic Design Classification" – Some FPL plants were designed, constructed and licensed based on criteria available prior to this Regulatory Guide being issued. The specific design criteria and seismic designations are reflected in each plant's UFSAR, and in other docketed analysis. Thus, the commitment to Safety/Regulatory Guide 1.29 is site specific, as required by the approved UFSAR/License at each FPL site. Sites may use this guidance to assist in establishing the lists of equipment to which this QAP applies, or for other purposes.	N	Note 3 – Language is somewhat different between FPLEDA-1 and proposed program. This is due to the differences in the plants and the proposed having to apply to multiple plants versus the current only addressing Duane Arnold.	
• Regulatory Guide 1.36, Revision 0, February 1973, "Nonmetallic Thermal Insulation for Austenitic Stainless Steel" – FPLE Duane Arnold was not committed to this Regulatory Guidance during original construction. Regulatory Guide 1.36 may be used for plant modifications on a case by case basis, but this QATR makes no generic commitment thereto.	• Regulatory Guide 1.36, Revision 0, February 1973, "Nonmetallic Thermal Insulation for Austenitic Stainless Steel" –Some of the current FPL plants were committed to this Regulatory Guidance during original construction. Regulatory Guide 1.36 may be used for plant modifications on a case by case basis, but this QATR makes no generic commitment thereto.	N	Note 3 – FPLEDA-1 states Duane Arnold was not committed to this, whereas the proposed program states that some of the FPL plants were committed to this Regulatory Guidance. Nevertheless the wording is the same in that no generic commitment is made in either QATR.	
• Regulatory Guide 1.38, Revision 2, May 1977, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Item for Water-Cooled Nuclear Power Plants" – FPLE Duane Arnold substitutes NQA-1-1994 Subpart 2.2 for N45.2.2 in its commitment to Regulatory Guide 1.38.	• Regulatory Guide 1.38, Revision 2, May 1977, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Item for Water-Cooled Nuclear Power Plants" – FPL takes an exception to Subpart 2.2 as explained at right.	R - #4	Regarding Regulatory Guide 1.38, FP&L takes exception to Section 6.2.4 of Subpart 2.2 of ASME NQA-1-1994. Section 6.2.4 prohibits the use or storage of food, drinks, and salt tablet dispensers in controlled storage areas. Instead, the use and storage of these items shall be controlled and limited to designated areas where such use or storage is not deleterious to stored	The NRC previously approved this exception in Seabrook's UFSAR Chapter 17. This meets Criterion XIII of 10 CFR 50, Appendix B insofar as measures have been established to prevent damage or deterioration during storage of material and equipment.

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
			items.	
• Regulatory Guide 1.97, Revision 3, May 1983, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Access Plant and Environs Conditions During and Following an Accident"		R - #5	No mention is made of this Regulatory Guide in the proposed program.	FP&L does not take a position on Regulatory Guide 1.97 titled "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident" in the proposed topical report. Each unit has specific licensing commitments regarding this guide. In addition, neither Paragraph 17.3.II.A.7.b nor Section 17.3.VI.A recommends a position on the guide to be established in this topical report. Note that the definition of "Quality Related" in Appendix C and the Introduction commit to issue instructions controlling safety related instrumentation, instrumentation required to be operable by the plants' Technical Specifications and instrumentation that is essential to preventing or monitoring release of radioactive material to the environment which could exceed the guidelines of the relevant Offsite Dose Calculation Manual.
• 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" (Position C.7) – FPLE Duane Arnold commits to the quality assurance guidance cited in Position C.7. Compliance with the remainder of the [technical] positions of Regulatory Guide 1.143 is as addressed in the plant UFSAR.	• 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" (Position C.7) – FPL meets the intent of the quality assurance guidance cited in Position C.7. Compliance with the remainder of the [technical] positions of Regulatory Guide 1.143 is site specific, as addressed in each plant UFSAR.	R - #6	The proposed program "meets the intent of the quality assurance guidance" whereas FPLEDA-1 "commits to the quality assurance guidance".	FPL meets the intent of the quality assurance guidance cited in Regulatory Position C.7 of Revision 2 of Regulatory Guide 1.143 titled "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants." In accordance with Regulatory Position D of Revision 2, there is no intent to backfit this guidance on current licensees. Radioactive waste management systems already exist at each site.
• Regulatory Guide 1.155, Revision 0, August 1988, "Station Blackout" (Position C.3.5) – FPLE Duane Arnold commits to the quality assurance guidance cited in	• Regulatory Guide 1.155, Revision 0, August 1988, "Station Blackout" (Position C.3.5) - FPL meets the intent of the quality assurance guidance cited in Position C.3.5, Appendix	R - #7	The proposed program "meets the intent of the quality assurance guidance" whereas FPLEDA-1 "commits to the quality assurance guidance".	(see above)

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Position C.3.5, Appendix A. Compliance with Appendix B and the remainder of the [technical] positions of Regulatory Guide 1.155 is as addressed in the FPLE Duane Arnold UFSAR or License commitments.	A. Compliance with Appendix B and the remainder of the [technical] positions of Regulatory Guide 1.155 is site specific, as addressed in each plant UFSAR or License commitments.			
• Regulatory Guide 4.15, Revision 1, February 1979, Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment" – FPLE Duane Arnold commits to compliance with Regulatory Guide 4.15.	• Regulatory Guide 4.15, Revision 1, February 1979, Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment" – FPL meets the intent of Regulatory Guide 4.15.	R - #8	The proposed program "meets the intent of the Regulatory Guide" whereas FPLEDA-1 "commits to compliance with the Regulatory Guide".	FPL does not commit to Regulatory Guide 4.15 titled "Quality Assurance for Radiological Monitoring programs (Normal Operations) – Effluent Streams and the Environment." The radiological monitoring programs, which have already been established at each of the FPL plants, meet the intent of this guide.
• Generic Letter 85-06, April 1985, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety-Related" – FPLE Duane Arnold commits to the quality assurance guidance cited in the Generic Letter		N	Note 3 - FPL does not take a position on Generic Letter 85-06 titled "Quality Assurance Guidance for ATWS Equipment That Is Not Safety-Related" in the proposed topical report. Each unit has specific licensing commitments regarding Anticipated Transient without Scram (ATWS) Equipment. In addition, neither Paragraph 17.3.II.A.7.c nor Section 17.3.VI.B recommends a position on the letter to be established in this topical report. Note that the definition of "Quality Related" in Appendix C and the Introduction commit to issue instructions controlling equipment whose failure could: i) result in releases exceeding the exposure guidelines of the Offsite Dose Calculation	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
			ii) Manual, or under an anticipated transient, result in the reactor coolant system not being in a controlled or design condition while operating.	
• Regulatory Issue Summary (RIS) 2000-18 titled "Guidance on Managing Quality Assurance Records in Electronic Media" – NMC will comply with this RIS should NMC choose electronic media storage as a means of maintaining required records.	• Regulatory Issue Summary (RIS) 2000-18 titled "Guidance on Managing Quality Assurance Records in Electronic Media" – FPL will comply with this RIS in instances when FPL chooses electronic media storage as a means of maintaining required records.	N	Note 3 – FPL commits to Regulatory Issue Summary (RIS) 2000-18 titled "Guidance on Managing Quality Assurance Records in Electronic Media." Note that Section B.17 already contains provisions for verifying and validating software including software that would used with electronic records.	
• Regulatory Guide 7.10, Revision 1, June 1986, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material"	• Regulatory Guide 7.10, Revision 2, March 2005, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material"	I - #2	The proposed program is committed to a more current edition of the Regulatory Guide. FPL commits to Revision 2 of Regulatory Guide 7.10 titled "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material."	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B PERFORMANCE/VERIFICATION	B PERFORMANCE/VERIFICATION		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.2 Design Control	B.2 Design Control		None	

FPL Energy Duane Arnold, LLC (Paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.3 Design Verification	B.3 Design Verification	N	The proposed program revises the words concerning independent verification of the frequency and effectiveness of the use of supervisors as design verifiers to match the words in NRC SRP 17.3.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.4 Procurement Control	B.4 Procurement Control	N	Note 3 - The word "form" is included in the proposed program when describing what is considered when original technical or quality assurance requirements cannot be determined.	
		I - #3	FPLEDA-1 states that "...agencies which may provide items or services... are not required to be evaluated or audited", the proposed program deletes the word may.	
		R - #9	The proposed program allows for a 90-day grace period for the requirement to audit suppliers on a triennial basis.	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. Also, reference NRC letter from G. S. Vissing to R. C. Mecredy, RG&E, dated July 22, 1998. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in the QATR "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-

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
				years plus 90 days."
		R - #10	The proposed program allows for the acceptance of accreditation in lieu of performing an audit when purchasing commercial grade calibration services from a supplier that has been accredited.	FPL may accept 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 NRC letter from D. S. Collins to G. R. Overbeck, APS. Additionally, the SER states that: "When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body ... accreditation may be accepted in lieu of the Purchaser imposing a QA Program consistent with ANSI N45.2-1971, provided all the following are met: 1. The accreditation is to ANSI/ISO/IEC 17025. 2. The accrediting body is either NVLAP or an accrediting body recognized by NVLAP through an MRA. 3. The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. 4. The purchase documents impose additional technical and administrative requirements, as necessary, to satisfy APS QA Program and technical requirements. 5. The purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance." The conditions stated above are met by FPL through Section B.4 of the

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
				QATR and lower tier procurement documents.

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.5 Procurement Verification	B.5 Procurement Verification		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.6 Identification and Control of Items	B.6 Identification and Control of Items		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.7 Handling, Storage and Shipping	B.7 Handling, Storage and Shipping	N	Note 3 – The proposed program does not have the words "the control of radiation zones" when referring to housekeeping. However, the word implies that this is within the realms of the controls.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.9 Test Control	B.6 Test Control		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.9 Measuring and Test Equipment Control	B.9 Measuring and Test Equipment Control		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.10 Inspection, Test and Operating Status	B.10 Inspection, Test and Operating Status		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.11 Special Process Control	B.11 Special Process Control		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.12 Inspection	B.12 Inspection		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.13 Corrective Action	B.13 Corrective Action		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.14 Document Control	B.14 Document Control	N	Note 3 – Page numbers for location of Appendix B are different for current program and proposed.	
		R - #11	FPLEDA-1 requires that at least one person who approves temporary changes to procedures has an active senior reactor operator's license. The proposed program does not require the person's license to be active.	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.

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.15 Records	B.15 Records	I - #4	The proposed program includes the words "optical or" when referring to when NRC guidance in RIS 2000-18 is complied with. FPLEDA-1 only specifies electronic records. Note that RIS 2000-18 includes optical disks within its scope.	
		I - #5	The proposed program adds a requirement that the records of the service lives of all snubbers including the date at which service life commences and associated installation and maintenance records have lifetime retention.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.16 Plant Maintenance	B.16 Plant Maintenance		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
B.17 Computer Software Control	B.17 Computer Software Control		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	D's	Basis for Reduction in Commitment Meeting Appendix B
C. ASSESSMENT	C. ASSESSMENT			
C.1 Methodology	C.1 Methodology	N	Note 2 and 3 – FPLEDA-1 utilizes the title Nuclear Oversight, whereas the proposed program utilizes the term Quality Assurance.	
		N	Note 3 – The words in FPLEDA-1 state "In lieu of the term "audit", substitute "independent assessment(s)" whereas the proposed program allows the use of either word.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
C.2 Self-assessment	C.2 Self-assessment		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
C.3 Independent Assessment	C.3 Independent Assessment	N	Proposed program use the word "routine" whereas FPLEDA-1 uses the word "continuing" when referring to independent assessment cycles.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Table 1 Topics Subject to Performance-based Independent Assessment Considerations	Table 1 Topics Subject to Performance-based Independent Assessment Considerations	N	The presentation of the topics subject to performance-based independent assessment considerations differs from that in FPLEDA-1. However, the topics are comprehensive.	
		N	In a footnote "***" - proposed program use the word "routine" whereas FPLEDA-1 uses the word "continuing" when referring to independent assessment cycles.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Table 2 Topics Subject to Regulatory-related Independent Assessment Frequencies	Table 2 Topics Subject to Regulatory-related Independent Assessment Frequencies	R - #12	The proposed program allows for extending the frequency for Emergency Planning and Security to two years based upon performance data.	Assessments of the emergency plan program elements and implementation of the security program may be extended up to two years based on performance data. This complies with 10 CFR 50.54(t) and 10 CFR 73.55(g)(4) insofar as the assessments may either be annual or be extended to biennial based on performance indicators and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness or security, as applicable, but no longer than 12 months after the change.
		N	Proposed program clarifies that the commitment for fire protection audits to include the use of a non-site, qualified fire protection specialist is triennial. This is consistent with NRC Administrative Letter 95-06.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Appendix A Plant Operating Review Committee	Appendix A Plant Operating Review Committee			
1.0 General	1.0 General	N	Note 2 – (Applies throughout this section) FPLEDA-1 calls it PORC proposed program calls it ORG.	
		N	Note 3 - FPLEDA-1 uses the term "independent review responsibilities" whereas the proposed program uses the terminology "review responsibilities".	
2.0 Composition	2.0 Composition		None	
3.0 Meetings	3.0 Meetings		None	
4.0 Review	4.0 Review	N	Note 3 – Proposed program adds the word "NRC" before statutes.	
5.0 Authority	5.0 Authority	I - #6	The proposed program uses the word "must" when describing reporting of results, whereas FPLEDA-1 does not use this word.	
6.0 Records	6.0 Records		None	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
APPENDIX B Procedures	APPENDIX B Procedures		None - Note that the types of procedures that are listed are the same as in FPLEDA-1 other than the list has been rearranged alphabetically.	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
APPENDIX C Definitions	APPENDIX C Definitions	I - #7	The proposed program includes definitions not contained in FPLEDA-1. These are: • Quality Instruction • Quality Related FP&L uses the definitions of terms as provided in Section 4 of the Introduction of ASME NQA-1-1994. a. In Section A.7.1, FPL commits to compliance with 10 CFR 21. Note that 10 CFR 21.3 contains expanded definitions of "commercial grade items" and the applicability of these definitions as well as the dedication of these items than found in the Introduction of NQA-1. b. While FPL commits to the definition of "nonconformance" in NQA-1, this does not preclude FPL from using regulatory guidance such as found in Regulatory Issue Summary 2005-20 titled "Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, 'Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability."	

FPL Energy Duane Arnold, LLC (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
APPENDIX D REVISION SUMMARIES	APPENDIX D REVISION SUMMARIES		No changes. The only difference is reflective of the change in revision status from the current program to the proposed program.	

Legend:

Note 1 –
"I" – Increase in commitment
"N" – No technical change in commitment
"R" – Reduction in commitment

Note 2 – Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to the Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.

Note 3 - Methodology details (the "how") in the current program description are not included in the proposed QATR. The intent of the QATR is to establish appropriate/sufficient requirements (the "what") to provide a quality assurance program meeting 10CFR50, Appendix B, but to allow flexibility in how the requirements are met. Therefore, this change in methodology detail (the "how") is not considered to be a reduction in commitment.

Note 4 - The QATR does not assign responsibilities beyond those listed in Section A.2 and A.3. The responsibilities listed in the current QATR are documented in lower tier documents.

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
1.8 CONFORMANCE TO NRC REGULATORY GUIDES	A.7 Regulatory Commitments	N	Note 2 – This section defines conformance to regulatory guides relative to balance of plant. Some of the details in this section are not in the proposed program.	

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. The SER for the NMC submittal summarizes the independent bodies that NMC states perform reviews previously performed by the OSRC. The FPL QATR essentially meets all of these SER commitments: 1. ORG will perform the independent review of safety evaluations for changes in the facility as described in the final safety analysis report (FSAR) prior to implementation of the change. ORG will evaluate the effect on safety and if a technical specification (TS) change or NRC review is required. As applicable, the ORG review will be augmented by another review that is completed during the design process. The QATR requires that design verification be performed by any competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization. These reviews verify that changes in the facility do not

				result in a loss of adequate design or safety margins. (See FPL QATR Appendix A and Section B.3) 2. A qualified person, independent of the preparer, will review changes in procedures as described in the FSAR prior to implementation of the change. The procedure review process includes an independent evaluation of changes to determine if a TS change or other NRC approval is required. Independent assessments of selected procedure changes will be performed to verify that procedure reviews and revision controls are effectively implemented. Independent assessments are performed by the Nuclear Oversight Organization to verify effective implementation of procedures and processes. (See FPL QATR Appendix A and Section C). 3. ORG will perform the independent review of TS changes and license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change. (See FPL QATR Appendix A). 4. ORG will perform the independent review of violations, deviations, and reportable events which require reporting to the NRC. This review will include the results of investigations and recommendations resulting

				from such investigations to prevent or reduce the probability of recurrence of the event. (See FPL QATR App. A) 5. ORG will perform an independent review of any matter related to nuclear safety that is requested by the Site Vice President, Site Director, or plant manager. (See FPL QATR Appendix A). 6. FPL's review and assessment programs include review of significant proposed plant changes or tests, verification that reportable events are promptly investigated and corrected, and look for trends which may not be apparent to the day-to-day observer. The Nuclear Oversight management and management responsible for the areas assessed, will review the results of all independent assessments. (See FPL QATR Appendix A and Section C.3). 7. ORG and the Nuclear Oversight Organization, collectively, will perform the independent review of the corrective actions for significant conditions adverse to quality. Provisions for independent assessments of the audit program are incorporated into the QATR to ensure the effectiveness of the oversight process. (See Appendix A and Section C.3). 8. FPL periodically will perform independent reviews of matters involving the safe operation of its fleet of nuclear plants. (See Section C.1).

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). The FPL organization bases this on the elements of (1) a mature operating experience program, (2) an effective corrective action program, and (3) site design and systems engineering organizations, supplemented by other processes and programs described in the QATR.

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE	Policy Statement Introduction A.1 Methodology	R – #4	The current program states "The Operational Quality Assurance Program (OQAP), described below, and its associated management controls for materials and activities meet the applicable regulatory requirements of 10 CFR 50, Appendix B and is the program established to meet this policy". The proposed program states "Portions of the FPL Quality Assurance Program requirements are also applicable to Quality Related items and services". Note: The current program treats items as Safety Related, whereas the proposed program allows for the use of Quality Related for certain items and services.	See above. (Introduction and definition of "Quality Related" in Appendix C) An expanded explanation of the applicability of the FPL Quality Assurance Topical Report is provided.

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.1 Organization	A.2 Organization		None – Title only	
17.2.1.1 Program Responsibility	A.1 Methodology A.2 Organization A.2.1.2.f Director Nuclear Assurance	N	Note 2 – The current program states "The Program, which is presented in the following sections, is expressed as an outline of the assignments, actions and procedures that, taken together, will result in proper management and operation of activities at Seabrook Station." Although these words could not be directly located in the proposed program, the intent of the proposed program is to result in proper management and operation of activities through statements such as "Facilities shall be operated in compliance with the requirements of the Code of Federal Regulations, the applicable Nuclear Regulatory Commission (NRC) Facility Operating Licenses, and applicable laws and regulations of the state and local government." The caveat that some titles and reporting relationships may vary between corporate and some sites, but in all cases there is a designated position to carry out the defined responsibilities, is moved from the site	

			organization in the proposed program to the overall organization. In addition, the titles and responsibilities vary between FPL and NMC. However, the organizational structure, functional responsibilities, levels of authority, and interfaces as recommended in Paragraph 17.3.II.A.2.a are defined. This meets Criterion I of 10 CFR 50, Appendix B insofar as the authority and duties of persons performing activities affecting the safety related functions of structures, systems and components are clearly established and delineated in writing.	
		N	Note 3 – The current program states "The Director of Nuclear Assurance will mediate disputes arising within the OQAP. Where disagreement persists, the matter may be appealed to the Senior Vice President, Nuclear and Chief Nuclear Officer for final resolution." These words are not in the proposed program.	
17.2.1.2 Delegation of Authority and Assignment of Responsibility	A.1 Methodology A.2.1.2 Chief Nuclear Officer (CNO) A.2.1.2.f Director Nuclear Assurance A.2.2.2.d Site Quality Manager	N	Note 3 – The words "... FPLE Seabrook reviews the approved contractor's documentation, audits its performance in accordance with the vendor oversight	

			program and coordinates the work to ensure a quality work product for the Seabrook project" are not in the proposed program.	
17.2.1.3 Organizational Structure	A.2.1 Corporate Organization A.2.2 Site Organization Appendix A On-Site Review Group	N	Note 3 and Note 4 – Some of the details under titles such as that for the Senior Vice President, Nuclear and Chief Nuclear Officer; Nuclear Oversight Manager; Manager of Materials Management; and Concerns Resolution Manager are not in the proposed program.	
		N	Note 2 and Note 4 – Various titles are different from the current program to the proposed. These include: - The General Manager of Nuclear & Power Generation Materials Operation versus Nuclear Materials Manager - The Station Director versus Plant Manager - Manager of Engineering versus Engineering Manager - Nuclear Oversight Manager versus Site Quality Manager - Regulatory Programs Manager versus Licensing Manager	
		N	Note 3 –	

			The following titles and descriptions are contained in the current program, but not in the proposed program: - Maintenance Manager - Operations Manager - Outage Manager - Work Control Manager - Concerns Resolution Manager - Manager of Performance Improvement and Operating Experience - Security Manager	
		N	Note 3 – The current program states "The Training Department will remain independent of the remainder of the Seabrook Station staff to ensure that training is able to maintain sufficient organizational freedom to allow independency from operating pressures." These words are not in the proposed program. Note: Training does report off-site under the proposed program.	
17.2.1.4 Authority to Stop Work	A.2.2.2d Site Quality Manager	N	Note 3 – The current program states "The Nuclear Oversight Manager and designated personnel from these groups including contracted personnel have the responsibility and written authority to stop work or	

			other activities that are not in compliance with the program." The proposed program gives stop work authority to the Director Nuclear Assurance and the Site Quality Manager, but does not mention words "and designated personnel from these groups including contracted personnel". However, the program does allow for delegation of duties.	
17.2.1.5 Responsibility to Report	B.13 Corrective Action	N	Note 3 – The current program words "Should the circumstances warrant such action...the situation is to be further reported to the Nuclear Oversight Manager or to other increasingly higher levels of FPLE Seabrook management until appropriate action is observed to be undertaken" are not in the proposed program.	

Current OAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.2.1 Outline	A.5 Personnel Training and Qualification	N	Note 2 – The words in the current program are introductory in nature and are not in the proposed program.	
		R - #5	The proposed program allows for a 90-day grace period for annual evaluations for lead auditor proficiency.	FPL takes exception to Sections 4.1 and 6.3 of Supplement 2S-3 concerning a grace period for the documented annual evaluation of lead auditors. This meets Criterion XVIII of 10 CFR 50, Appendix B insofar as audits are performed by appropriately trained personnel. (Reference FPL TQAR Appendix C). Also, reference NRC letter from G.S. Vissing to R.C. Mecredy, RG&E, dated July 22, 1998. The additional requirement of the SER that "in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days" is covered by the FPL QATR.
17.2.2.2 Scope of Structures, Systems, and Components	Introduction	N	Note 3 – The details in the current program as to "The OQAP applies to structures, systems or components which are required to assure..." and "In addition, certain other structures, systems, components, and activities determined to be within the scope of the OQAP are listed below..." are not in the proposed program.	

		R- #4 (See discussion above)	Some areas defined in the current program (i.e., Steam Generator Steam Flow Restrictors, Spent Fuel Pool Liner, Flood Prevention Design Features, etc.) are not specifically noted in the proposed program. Note: This concerns the Safety Related versus Quality Related handling of items and services.	See above discussion regarding "Quality Related."
		R – #4 (See discussion above)	The current program states "All equipment required to cope with Station Blackout is safety related". The proposed program commitment is to Regulatory Guide 1.155 Position C.3.5, Appendix A. The current program states "All safety-related equipment is within the scope of the Operational Quality Assurance Program, which complies with the requirements of 10 CFR 50, Appendix B, which exceeds the quality assurance requirements described in RG 1.155." These words are not in the proposed program.	The proposed program states that compliance with Appendix B of Regulatory Guide 1.155 and the remainder of the technical positions of the guide is site specific, as addressed in each plant's UFSAR or License commitment. See also the above discussion regarding "Quality Related."
17.2.2.3 Program Implementation	Introduction	N	Note 3 – The details in this section such as "A three-level approach is defined to assure program	

			implementation to the degree necessary" are not in the proposed program.	
17.2.2.4 Program Standards	A.7 Regulatory Commitments	N	Note 3 – The following Regulatory Guides, cited in the current program, were not noted in the proposed program. However, the commitment to NQA-1 in the proposed program encompasses these commitments. - 1.58, September 1980, Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel - 1.64, June 1976, Quality Assurance Requirements for the Design of Nuclear Power Plants - 1.74, February 1974, Quality Assurance Terms and Definitions - 1.88, October 1976, Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records - 1.123, July 1977, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants - Regulatory Guide 1.144, September 1980, Auditing of Quality Assurance Programmed for	

			Nuclear Power Plants - Regulatory Guide 1.146, August 1980, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants	
		N	Note 2 – The current program states "The Technical Specifications shall be the governing document in case of conflict between the Technical Specifications and the above references". These words are not located in the proposed program, however the operating license clearly takes precedent in these matters.	
		I - #1	Proposed program commits to Regulatory Guide 1.28.	
		I - #2	Proposed program commits to a more recent revision of Regulatory Guide 1.116.	
		I - #3	Proposed program commits to 10CFR72.	
17.2.2.5 Program Revision	A.1 Methodology A.2.1.2f Director Nuclear Assurance	N	Note 2 and Note 3 – The details in the current program of "Procedural controls are required to ensure that prior to making any change to the OQAP, a written evaluation shall be	

			prepared to identify the change, the reason it is needed, and the basis for concluding that the change results in an OQAP that continues to meet the criteria of Appendix B of 10 CFR 50" are not in the proposed program. However, this area is clearly controlled by the 50.54a process.	
17.2.2.6 Procedures	B.14 Document Control Section C Assessment Appendix B Procedures		None – Requirements are contained in the program or NQA-1 Basic Requirement 6 and Supplement 6S-1.	
17.2.2.7 Management Evaluation	A.2.2.2.d Site Quality Manager	N	Note 3 – Details contained in the current program on what meetings may include are not in the proposed program.	
		R – #6	The current program states "CNRB performs a biennial audit of the OQAP and submits a report to the Senior Vice President, Nuclear and Chief Nuclear Officer. This report provides FPLE Seabrook management with an independent assessment of the OQAP. The CNRB identifies and tracks corrective action." These words are not in the proposed program. Note: The auditing	1. See above discussion regarding 10 CFR 50.54(a)(3)(ii). 2. (Sections C.1 and C.3) FPL does not commit to perform an independent review for each generating site each year as in NMC-1. Instead, either a Quality Assurance expert panel decides which topics (from Table 1) receive independent assessment at what frequency or the topics in Table 1 are audited as a minimum of biennially. This

			program covers all of these activities. Additionally, the proposed program still commits to independent assessments of the QA organization.	meets Paragraphs 17.3.II.C.2.a, d and e insofar as assessments are planned and periodic, and scheduling is based on status and safety importance.
17.2.2.8 Indoctrination and Training	A.5 Indoctrination and Training	N	Note 3 – The details in the current program on "The introductory training segment instructs new or transferred employees...For the formal training programs, documentation includes the objectives, content of the Program, attendees, and dates of attendance" are not in the proposed program.	
		N	Note 3 – The words in the current program "The scope, technical content, and frequency of training is determined by the Nuclear Oversight Manager. Tests are given as necessary to those Oversight personnel performing and verifying activities affecting quality. Acceptance criteria are developed to determine if individuals are properly trained and qualified. Employee proficiency is maintained by retraining, re-examining, or recertifying" are not in the proposed program.	

		N	Note 3 – The detailed words in the current program "The licensed training program assures that a sufficient number of appropriately trained and licensed individuals are available to operate Seabrook Station" are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.3 Design Control	B.2 Design Control		None – Title only	
17.2.3.1 Scope	B.2 Design Control	N	Note 3 – The details on what design control is applied to and what it considers in the current program (i.e., field engineering, core physics, seismic...etc.) are not in the proposed program.	
17.2.3.2 Design Document Preparation, Review and Approval	B.2 Design Control	N	Note 3 – The specific details contained in this section are not in the proposed program.	
		N	Note 3 – The words in the current program "Criteria and methods used by vendors/contractors which may affect the design of Seabrook are evaluated and approved prior to use" are not in the proposed program. However, this area is covered under control of contractors.	
17.2.3.3 Design Verification	B.2 Design Control B.3 Design Verification B.17 Computer Software Control	N	Most requirements are contained in the program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, Note 3 –	

			Details on areas such as what design verification procedures should contain "...specify which documents receive formal design verification by interdisciplinary or multi-organizational teams...." are not in the proposed program.	
		I - #4	Proposed program places additional controls on the use of supervisors for design verification.	
		I - #5	The proposed program commits to the requirements of NQA-1 Subpart 2.7 and Supplement 11S-2 for computer program testing. Note: FPL commits to Regulatory Issue Summary (RIS) 2000-18 titled "Guidance on Managing Quality Assurance Records in Electronic Media" in instances when FPL chooses electronic media storage as a means of maintaining required records (see Section A.7.3). Section B.17 contains provisions for verifying and validating software including software that would be used with electronic records.	
17.2.3.4 Design Changes	B.3 Design Verification B.14 Document Control Appendix A On-Site Review Group		Most requirements are contained in the program or NQA-1 Basic Requirement 3	

		N	and Supplement 3S-1. However, Note 3 – The current program words "Station design changes and related changes to station procedures are controlled and incorporated in the license training program" are not in the proposed program.	
17.2.3.5 Deviations	B.13 Corrective Action	N	Note 3 – Details in the current program (i.e., Errors/deficiencies may be revealed by verification measures, use of document, audit, tests, actual failure, or other means, etc.) are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.4 Procurement Document Control	B.4 Procurement Control		None – Title only	
17.2.4.1 Procurement Planning	B.4 Procurement Control		None - Requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	
17.2.4.2 Procurement Document Preparation and Review	B.4 Procurement Control	N	Most requirements are contained in the program or NQA-1 Basic Requirements 4 and 7 and Supplements 4S-1 and 7S-1. Note 3 – The details in the current program such as what is included in the quality review are not in the proposed program.	
		N	Details on the procurement of nuclear fuels and appurtenances contained in the current program (i.e., As part of its responsibility, the approved contractor or FP&L's Nuclear Division may issue contracts for fuel fabrication, etc.) are not in the proposed program.	
		N	Note #3 – Details on the purchase order process and Service Level Agreements contained in the current program (i.e., ...FPLE Seabrook	

			Purchasing personnel transcribe the procurement information of a purchase order...) are not in the proposed program.	
17.2.4.3 Selection of Procurement Sources	B.4 Procurement Control	N	Some of the requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1. However, Note 3 – The current program words on the AVL and maintenance of it, such as "Nuclear Oversight has the assigned responsibility to generate and maintain an Approved Vendors List (AVL) which identifies those vendors able to meet FPLE Seabrook requirements..." are not in the proposed program. However, this has been defined as a responsibility of QA in the proposed program.	
		N	Note 3 – The details on placing a vendor on the AVL (i.e., The vendor holds a valid ASME Nuclear Certificate of Authorization, etc.) are not in the proposed program.	
17.2.4.4 Bid Evaluation and Award	B.4 Procurement Control		None - Requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	

		R - #7	The proposed program allows for a 90-day grace period for the requirement to audit suppliers on a triennial basis.	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. Also, reference NRC letter from G.S. Vissing to R.C. Mecredy, RG&E, dated July 22, 1998. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in Section B.4 of the QATR "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-years plus 90 days."
		R - #8	The proposed program allows for the acceptance of accreditation in lieu of performing an audit when purchasing commercial grade calibration services from a supplier that has been accredited.	FPL may accept 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 NRC letter from D.S. Collins to

				G.R. Overbeck, APS. Additionally, the SER states that: "When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body ... accreditation may be accepted in lieu of the Purchaser imposing a QA Program consistent with ANSI N45.2-1971, provided all the following are met: 1. The accreditation is to ANSI/ISO/IEC 17025. 2. The accrediting body is either NVLAP or an accrediting body recognized by NVLAP through an MRA. 3. The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. 4. The purchase documents impose additional technical and administrative requirements, as necessary, to satisfy APS QA Program and technical requirements. 5. The purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance." The conditions stated above are met by FPL through Section B.4 of the

				QATR and lower tier procurement documents.
17.2.4.5 Surveillance, Inspection and Audit	A.2.2.2e Nuclear Materials Manager B.4 Procurement Control B.5 Procurement Verification		None - Requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	
17.2.4.6 Acceptance	B.5 Procurement Verification		None - Requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.5 Procedures, Instructions and Drawings	B.14 Document Control		None – Title only	
17.2.5.1 FPLE Seabrook	A.1 Methodology APPENDIX B Procedures	N	Note 3 – Details of the procedure program (i.e., These procedures establish the system for offsite interfaces, conduct of operations,...; and The FPLE Seabrook Materials Management Manager provides procedures for accomplishing routine activities within the Purchasing function which define the interfaces with other FPLE...) are not in the proposed program.	
		N	Note 3 – The current program words "Nuclear Training prepares and maintains procedures necessary to provide instructions to administer and document the licensed and nonlicensed training program and keep abreast of design changes which impact the simulator" are not in the proposed program.	
		N	Note 3 – The current program words "The Oversight Group will conduct reviews, surveillances and/or audits of the procedure review	

			process" are not in the proposed program. Note: Procedures are reviewed as part of each audit.	
		N	Note 3 – The details on as-builts provided in the current program are not in the proposed program.	
17.2.5.2 Contracted Services	Introduction Section C Assessment		None	
17.2.5.3 Contractors	Introduction	N	Note 3 – The details on the requirements of contractors and their procedures are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)		A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.6 Document Control	B.14 Document Control		None – Title only	
17.2.6.1 Scope	B.14 Document Control		None - Requirements are contained in the program or NQA-1 Basic Requirement 6 and Supplement 6S-1. However, the proposed program does make some increases in commitment as detailed below.	
		I - #6	Proposed program requires the establishment of levels of use of procedures.	
		I - #7	Proposed program requires that documentation be maintained to assure that QAP requirements are met and are not inadvertently removed in later revisions.	
		I - #8	Proposed program has words that require programmatic procedure preparation, review, and usage controls to ensure procedures are technically and administratively correct.	
17.2.6.2 Issuance	Introduction B.14 Document Control		None – Requirements are contained in the program or NQA-1 Basic Requirement 6 and Supplement 6S-1.	
17.2.6.3 Control	B.14 Document Control		Most requirements are contained in the program or	

		N	NQA-1 Basic Requirement 6 and Supplement 6S-1 Note 3 – Details on the control of documents included in the current program (i.e., The FPLE Records Management (RMD) Division maintains a system...) are not in the proposed program.	
17.2.6.4 Changes	B.14 Document Control	N	Most requirements are contained in the program or NQA-1 Basic Requirement 6 and Supplement 6S-1. Note 3 – Details included in the current program (i.e., for those documents which are not on controlled distribution, the required verification of revision status prior to each use results in purging outdated documents from the work area...) are not in the proposed program.	
		R – #9	The current program words "FPLE Seabrook performs biennial reviews of non-routine Emergency Operating Procedures, Abnormal Operating Procedures and the Emergency Plan Procedures. This biennial review requirement is implemented through the administrative controls for these procedures" are not in the proposed program.	1. (Table 2) Assessments of the emergency plan program elements may be extended up to two years based on performance data. This complies with 10 CFR 50.54(t) insofar as the assessments may either be annual or be extended to biennial based on performance indicators and as soon as reasonably practicable after a change occurs in procedures that

				potentially could adversely affect emergency preparedness but no longer than 12 months after the change. 2. FPL does not commit to perform an independent review for each generating site each year. Instead, either a Quality Assurance expert panel decides which topics (from Table 1) receive independent assessment at what frequency or the topics in Table 1 are audited as a minimum of biennially. This meets Paragraphs 17.3.II.C.2.a, d and e insofar as assessments are planned and periodic, and scheduling is based on status and safety importance.
		N	Note 3 – Details on the pre-job practice contained in the current program are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.7 Control of Purchased Material, Equipment and Services			None – Title only	
17.2.7.1 Planning	B.5 Procurement Verification	N	Most requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1. Note 3 – Details in the current program concerning the review of procurement documents are not in the proposed program.	
17.2.7.2 Source Activities	B.5 Procurement Verification	N	Note 3 – Details in the current program concerning source activities (i.e., ...formally report to the FPLE Seabrook Staff on their quality findings...) are not in the proposed program.	
		N	Note 3 – The specific words in the current program "Personnel assigned these activities have the delegated authority to stop work if necessary" are not in the proposed program. However, the Site Manager does delegate this authority.	
17.2.7.3 Receipt Inspection	A.5 Personnel Training and Qualification B.5 Procurement Verification B.12 Inspection	N	Note 3 – The words in the current program "Personnel	

			performing receipt inspection will be certified by the Nuclear Oversight Manager to Regulatory Guide 1.58..." are not in the proposed program.	
		N	Note 3 – Details on oversight of receipt inspections are not in the proposed program.	
17.2.7.4 Documentation	B.5 Procurement Verification		None – Requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	
17.2.7.5 Status	B.5 Procurement Verification		None – Requirements are contained in the program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.8 Identification and Control of Materials, Parts and Components			None – Title only	
17.2.8.1 Identification	B.4 Procurement Control B.6 Identification and Control of Items		None – Requirements are contained in the program or NQA-1 Basic Requirements 4 and 8 and Supplements 4S-1 and 8S-1.	
17.2.8.2 Control	B.6 Identification and Control of Items	N	Most requirements are contained in the program or NQA-1 Basic Requirement 8 and Supplement 8S-1. Note 3 – Details on subjects such as "at storeroom issue" contained in the current program are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.9 Control of Special Processes	B.11 Special Process Control		None – Title only	
17.2.9.1 Process Qualification	B.11 Special Process Control	N	Most requirements are contained in the program or NQA-1 Basic Requirement 9 and Supplement 9S-1. However, Note 2 – The current program includes "plating" as a special process. This is not included in the "such as" list in the proposed program.	
		N	Note 3 – Details on oversight activities included in the current program are not in the proposed program.	
		R – #10	The current program contains words "When special processes are to be performed by vendors/subcontractors onsite, prior approval of their procedures by Station Staff is required..." These words are not in the proposed program.	Section B.14 of the proposed program requires procedures governing generating site activities, such as modifications, repair, replacements, and maintenance, to be reviewed by qualified personnel as designated by the Plant Manager.
17.2.9.2 Personnel Qualification	B.11 Special Process Control	N	Note 3 – The specific words in the current program "Training and examinations are administered to determine the capability of each	

			individual" are not in the proposed program.	
		N	Note 3 – The specific words in the current program "The period of validity and criteria for requalification are in accordance with the applicable codes, specification and standards" are not in the proposed program.	
17.2.9.3 Process Performance	B.8 Test Control B.11 Special Process Control	N	Some requirements are contained in the program or NQA-1 Basic Requirement 9 and Supplement 9S-1. However, Note 3 – The words in the current program "These documents provide for recording of evidence to indicate acceptance in accordance with the process requirements" are not in the proposed program.	
		R – #11	The words in the current program "Acceptance of results is performed by personnel qualified for acceptance of the special process" are not clearly defined in the proposed program.	Section A.5 defines personnel qualification. In addition, FPL commits to Supplement 2S-2 of ASME NQA-1-1994 for qualification of NDE personnel. Collectively, these commitments meet the requirements of the current program.

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.10 Inspection	B.12 Inspection		None – Title only	
17.2.10.1 General	A.5 Personnel Training and Qualification B.12 Inspection	R – #12	The current program words "Inspections associated with normal operations of the plant, such as maintenance, surveillance, and tests, are performed by Oversight". The proposed program states "...inspections are carried out by properly qualified persons independent of those who performed or directly supervised the work".	See the above discussion regarding 10 CFR 50.54(a)(3)(ii). The proposed position meets Criterion X of 10 CFR 50, Appendix B insofar as Criterion X requires inspections to be performed by individuals other than those who performed the activity being inspected.
		N	Note 3 – The current program states "Inspectors are trained and certified to meet the requirements of ANSI N45.2.6 by the Nuclear Oversight Manager..." These words are not in the proposed program. Note: All inspectors will still be trained and certified to a standard.	
17.2.10.2 Technical Specification Surveillance Tests	B.8 Test Control	N	Note 3 – Details contained in the current program on review and approval of original and subsequent revisions of the Technical Specification surveillance procedures (i.e., require review by SORC and approval of the Station Director...) are not in	

			the proposed program.	
		R – #13	The words in the current program "Oversight performs surveillances of Technical Specification tests" are not in the proposed program.	Technical Specifications will still be audited under the new program.
17.2.10.3 Maintenance and Modification Inspection	B.12 Inspection B.16 Plant Maintenance	N	Note 3 – The specific words contained in the current program "Documents that provide instructions for performing the activities specify the inspection requirements and are selectively reviewed, surveilled and/or audited by the Oversight Group" are not in the proposed program.	
17.2.10.4 Receipt Inspection	B.12 Inspection		None – Words are editorial only	
17.2.10.5 In-Service Inspection	B.12 Inspection	N	Note 3 – The details contained in this section concerning ISI are not in the proposed program.	
17.2.10.6 Contractor and Vendor Inspections	B.4 Procurement Control		Requirements are contained in the program or NQA-1 Basic Requirement 4 and Supplement 4S-1.	
17.2.10.7 Qualification of Personnel	A.2.1.2.f Director Nuclear Assurance A.5 Personnel Training and Qualification B.12 Inspection		Most requirements are contained in the program or NQA-1 Basic Requirement 2 and Supplement 2S-1. However,	

		R – #14	The words "The Nuclear Oversight Manager is responsible for review and acceptance of inspection procedures" are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
17.2.10.8 Inspection Documents	B.12 Inspection	N	Note 3 – The detail provided in this section on what is to be included in inspection procedures are not in the proposed program.	
17.2.10.9 Results/Records	B.12 Inspection		None – Requirements are contained in the program or NQA-1 Basic Requirement 10 and Supplement 10S-1.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.11 Test Control	B.8 Test Control		None – Title only	
17.2.11.1 Types of Tests	B.8 Test Control	N	Note 3 – The details on tests provided in this section are not in the proposed program.	
17.2.11.2 Test Procedures	B.8 Test Control B.14 Document Control Appendix A On-Site Review Group	N	Most requirements are contained in the program or NQA-1 Basic Requirement 6 and Supplement 6S-1. Note 3 – The words in the current program "In the case of contractor involvement, test procedures are submitted for approval as required by procurement documents" are not in the proposed program.	
17.2.11.3 Conduct of Tests/Results	A.5 Personnel Training and Qualification B.8 Test Control B.15 Records		None – Requirements are contained in the program or NQA-1 Basic Requirements 2, 11 and 17 and Supplements 2S-1, 11S-1, and 17S-1.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.12 Control of Measuring and Test Equipment	B.9 Measuring and Test Equipment Control		None – Title only	
17.2.12.1 Measuring and Test Equipment Lists	B.9 Measuring and Test Equipment Control	N	Note 3 – The words in the current program "The administrative procedure(s) for the control of Measuring and Test Equipment (M&TE) are selectively reviewed, surveilled and/or audited by the Oversight Group to assure its effectiveness" are not contained in the proposed program.	
17.2.12.2 Identification	B.8 Identification and Control of Items B.9 Measuring and Test Equipment Control	N	Note 3 – The words in the current program "A schedule is maintained which provides positive recall when recalibration is required and indicates the current status of all items" are not in the proposed program.	
17.2.12.3 Calibration	B.9 Measuring and Test Equipment Control APPENDIX B Procedures		None – Requirements are contained in the program or NQA-1 Basic Requirement 12 and Supplement 12S-1.	
17.2.12.4 Standards	B.9 Measuring and Test Equipment Control		None – Requirements are contained in the program or NQA-1 Basic Requirement 12 and Supplement 12S-1.	

17.2.12.5 Control	B.9 Measuring and Test Equipment Control		None – Requirements are contained in the program or NQA-1 Basic Requirement 12 and Supplement 12S-1.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.13 Handling, Storage and Shipping			None – Title only	
17.2.13.1 Procurement Provisions	B.7 Handling, Storage and Shipping	N	Note 3 – Details included in the current program on what is to be included and reviewed during the procurement process concerning handling, storage, and shipping are not in the proposed program.	
17.2.13.2 Receipt and Storage	B.7 Handling, Storage and Shipping	N	Note 3 – Details on the receiving process in the current program (i.e., The receipt inspection is documented and the item is assigned a storage location...) are not in the proposed program.	
		N	Note 3 – Details on what the oversight groups audit and perform surveillances on are not in the proposed program.	
17.2.13.3 Handling	B.7 Handling, Storage and Shipping		None – Requirements are contained in the program or NQA-1 Basic Requirement 13 and Supplement 13S-1.	
17.2.13.4 Packaging and Shipping	B.7 Handling, Storage and Shipping	N	Note 3 – Details on packaging and	

			shipping requirements contained in the current program (i.e., Items returned to a supplier are returned in the original container, etc.) are not in the proposed program.	
17.2.13.5 Personnel	A.5 Personnel Training and Qualification		None -- Requirements are contained in the program or NQA-1 Basic Requirement 2 requires all personnel performing activities effecting quality to be indoctrinated and trained to assure suitable proficiency.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.14 Test and Operating Status	B.10 Inspection, Test and Operating Status		None – Title only	
17.2.14.1 Status Indicators	B.10 Inspection, Test and Operating Status	N	Most requirements are contained in the program or NQA-1 Basic Requirement 14. Note 3 – The words "Nonconforming items are also documented and highlighted through the use of various devices to prevent inadvertent use" are not in the proposed program.	
17.2.14.2 Sequence of Operations	B.8 Test Control B.10 Inspection, Test and Operating Status B.12 Inspection	N	Note 3 – Details of the sequence of operations are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.15 Nonconforming Materials, Parts or Components			None – Title only	
17.2.15.1 Identification and Control	A.6 Corrective Action B.13 Corrective Action	N	Most requirements are contained in the program or NQA-1 Basic Requirement 15 and Supplement 15S-1. However, Note 3 – The words in the current program describing notification to affected organizations "through distribution of a report describing the nonconforming item" are not in the proposed program.	
17.2.15.2 Disposition and Resolution	A.6 Corrective Action B.13 Corrective Action	N	Note 3 – Many of the details in the current program such as "All dispositions are documented and signed by responsible parties" are not in the proposed program.	
		N	Note 3 – The current program states "A designated FPLE Seabrook Manager is responsible to administer the nonconformance reporting system. Each report of a nonconforming item is reviewed. This review verifies that the deficiency was properly and correctly stated, the	

			disposition and corrective action are acceptable, and assesses the effectiveness of the steps to prevent recurrence". These words are not in the proposed program.	
17.2.15.3 Trend Analysis	A.6 Corrective Action B.13 Corrective Action	N	Note 3 – The words in the current program "The Regulatory Programs Manager maintains a system to recognize, evaluate, document, and assess quality trends. The system provides for periodic analysis of reports on nonconforming items, condition reports, and the submittal of significant results to the Site Vice President and appropriate FPLE Seabrook management personnel for review and appropriate action" are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.16 Corrective Action	A.6 Corrective Action B.13 Corrective Action		None – Title only	
17.2.16.1 Initiation	A.6 Corrective Action B.13 Corrective Action	N	Many of the requirements are contained in the program or NQA-1 Basic Requirement 16. However, Note 3 – The details in the current program on what conditions for which corrective action may be warranted are not in the proposed program.	
		N	Note 3 – The specific words in the current program "A special report may be prepared when a significant condition adverse to safety is identified. This report identifies root causes and documents action taken to preclude recurrence" are not in the proposed program.	
		I - #9	Proposed program requires provisions be made to ensure that corrective actions for significant conditions adverse to quality are completed as intended and are not inadvertently nullified by subsequent actions.	
17.2.16.2 Assessment	A.6 Corrective Action B.13 Corrective Action	N	Note 3 – The words "The Seabrook	

			Nuclear Oversight Manager periodically reports to the FPLE Seabrook Directors and Site Vice President on the effectiveness of the corrective action process and status of incomplete items. Corrective action program results are included in the trend analysis program" are not in the proposed program. Note: this item is covered by the audit program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.2.17 Quality Assurance Records	B.15 Records		None – Title only	
17.2.17.1 Identification	B.15 Records	N	Most of the requirements are contained in the program or NQA-1 Basic Requirement 17 and Supplement 17S-1. However, Note 3 – Details in the current program such as "The compilation of records generated is forwarded to the Document Control Center for inclusion into the Station Records Management System..." are not in the proposed program.	
17.2.17.2 Receipt, Storage and Retrieval	B.15 Records	N	Most of the requirements are contained in the program or NQA-1 Basic Requirement 17 and Supplement 17S-1. However, Note 3 – The words "A suitable storage facility...is permanently located onsite" are not in the proposed program.	
17.2.17.3 Supplier Records	B.15 Records	N	Note 3 – Details on supplier records contained in the current	

			program are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.2.18 Audit	Section C ASSESSMENT		None – Title only	
17.2.18.1 Planning	Section C ASSESSMENT	N	Note 3 – Details of the planning process contained in the current program such as "...included in the plan, which is updated semiannually" are not in the proposed program.	
17.2.18.2 Performance	Section C ASSESSMENT	R – #2 (Same as earlier)	The words in the current program "The Oversight Group will perform independent audits under the direction of the CNRB" are not in the proposed program. (Note: This is related to the elimination of the CNRB).	(See basis for R - #1)
		I - #10	The proposed program requires periodic independent reviews of matters involving the safe operation of plants.	
		I - #11	The proposed program details a system of self-assessments.	
17.2.18.3 Reporting and Follow-up	Section C ASSESSMENT	R – #15	The words in the current program "Follow-up is required by both the audited and auditing organization when deficiencies are identified" are not in the proposed program.	Sections 6 and 7 of Supplement 18S-1 of NQA-1-1994 require that the audited organization investigate adverse audit findings and schedule corrective action, and the auditing organization is to verify the corrective action by follow-up action.
17.2.18.4 Audit Program Review	Section C ASSESSMENT	R – #2	The words in the current	See the discussion above concerning

		(Same as earlier)	program "An independent audit of the QA program effectiveness and appropriateness is initiated biennially by CNRB..." are not in the proposed program. (Note: This is related to the elimination of the CNRB).	assessment of the QA Program.

Current QAPD Section (paragraph)	QATR Section (paragraph)		Q's	Basis for Reduction in Commitment Meeting Appendix B
17A EXCEPTIONS, ALTERNATIVES AND CLARIFICATIONS TO PROGRAM STANDARDS, INDUSTRY CODES, FEDERAL REGULATIONS AND GUIDES	A.7.3 Regulatory Commitments	N	Note 2 – Current program takes exceptions to the following Regulatory Guides. All but one of the exceptions taken by Seabrook have been reviewed and determined to no longer be required due to one of more of the following reasons: (1) requirement not in NQA-1, (2) the requirement applying to preoperational activities, (3) the exception being covered in NQA-1, (4) the exception being covered in the proposed program, or (5) the exception no longer being needed. The Regulatory Guides effected are:: - Regulatory Guide 1.8 - Regulatory Guide 1.30 - Regulatory Guide 1.33 - Regulatory Guide 1.37 - Regulatory Guide 1.38 - Regulatory Guide 1.39 - Regulatory Guide 1.94 - Regulatory Guide 1.116 The exception that will remain in the proposed program effects Regulatory Guide 1.38 and concerns "The use or storage of food, drinks, and salt tablet dispensers in any storage area."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17C COMPANY NUCLEAR REVIEW BOARD (CNRB)	Appendix A On-Site Review Group		None – Title only	
17C.1 FUNCTION	Appendix A On-Site Review Group Section 1.0	R – #2 (Same as earlier)	The current program states that the CNRB "shall report to and advise the Senior Vice President, Nuclear and Chief Nuclear Officer" whereas the proposed program states that the OSRG is responsible to the plant manager.	See the above discussion regarding responsibilities and 10 CFR 50.54(a)(3)(ii).
17C.2 COMPOSITION	Appendix A On-Site Review Group Section 2.0		None	
17C.3 ALTERNATES	Appendix A On-Site Review Group Section 3.0	N	Note 3 – The current program states that alternate members may serve on a temporary basis. The proposed program states that they may serve on a temporary or permanent basis.	
17C.4 CONSULTANTS	Appendix A On-Site Review Group Section 2.0		None	
17C.5 MEETING FREQUENCY	Appendix A On-Site Review Group Section 3.0	R - #16	Many of the details of the current program concerning the CNRB are not in the proposed program. Appendix A of the proposed program is generic in nature "The ORG meets commensurate with the scope of activities, but minimal frequency requirements are specified in procedures." The current program is more specific in	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			many details. Examples of these include "The CNRB shall meet at least once per 6 months +/- 6 weeks".	
17C.6 QUORUM	Appendix A On-Site Review Group Section 3.0	R - #16 (same as earlier)	Many of the details of the current program concerning the CNRB are not in the proposed program. Appendix A of the proposed program is generic in nature "Rules for a quorum are established and adhered to." The current program is more specific in many details. An example of this is "The Quorum shall consist of ...at least four CNRB...".	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
17C.7 REVIEW	Appendix A On-Site Review Group Section 4.0	I – #12	The proposed program also includes 10 CFR 72.48 evaluations to be reviewed.	
		R - #2 (same as earlier)	The current program states that the CNRB shall review "Reports and meeting minutes of the SORC". The CNRB has been eliminated and its functions performed by the ORG in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		I - #13	The proposed program allows for additional personnel to request the review of areas.	
17C.8 AUDITS		R – #2 (same as earlier)	The words "Audits of station activities shall be performed under the cognizance of the CNRB" are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		N	Note 3 – Details of the audit program	

			contained in the current program (i.e., The audits shall be performed within a 2-year time interval, etc.) are not in the proposed program.	
17C.9 RECORDS	Appendix A On-Site Review Group Section 6.0	N	Note 3 – Details on records specified in the current program are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17D ADMINISTRATIVE CONTROLS			None – Title only	
17D.1 INDEPENDENT TECHNICAL REVIEWS		R – #3 (same as earlier)	The Technical Review Program detailed in the current program was not noted in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
17D.2 REVIEW AND AUDIT	Appendix A On-Site Review Group		None - The responsibilities of the SORC detailed in this section have been delegated to the ORG as detailed in other sections of this matrix.	
17D.3 RECORD RETENTION	B.15 Records	N	Note 3 – Details on records specified in the current program are not in the proposed program.	

Legend:

Note 1 - "I" – Increase in commitment
"N" – No technical change in commitment
"R" – Reduction in commitment

Note 2 – Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to the Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.

Note 3 - Methodology details (the "how") in the current program description are not included in the proposed QATR. The intent of the QATR is to establish appropriate/sufficient requirements (the "what") to provide a quality assurance program meeting 10CFR50, Appendix B, but to allow flexibility in how the requirements are met. Therefore, this change in methodology detail (the "how") is not considered to be a reduction in commitment.

Note 4 - The QATR does not assign responsibilities beyond those listed in Section A.2 and A.3. The responsibilities listed in the current QATR are documented in lower tier documents.

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Abstract	Introduction A.1 Methodology		None	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Introduction	Introduction A.1 Methodology	N	Note 3 - The proposed topical states that "Portions of the FPL Quality Assurance Program requirements are also applicable to Quality Related items and services". The current topical does not include this language in the Introduction but rather includes it in TQR 2.0 "...Portions of the FPL Quality Assurance Program requirements are also applicable to Quality Related items or services..." Introduction and definition of "Quality Related" in Appendix C. An expanded explanation of the applicability of the FPL Quality Assurance Topical Report is provided.	
		N	Note 2 – The current program states that it shall be applicable to all existing nuclear plants and those under construction. The proposed program is specific in naming the operating plants to which it applies.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
TQR Program Policy Quality Assurance Program Policy	Policy Statement A.2.1 Corporate Organization A.3 Responsibility	N	Note 3 - The current program states that FPL will merit public confidence by providing electricity in a reliable and safe manner. These specific words are not in the proposed program. However, these words are not required by regulatory documents.	
		N	Note 3 – The current program states that "The head of each organization performing quality related activities is responsible for: identifying those activities within their organization which are quality related as defined by the QA Program; establishing and clearly defining the duties and responsibilities of personnel within their organization who execute those quality related activities; and planning, selecting, and training personnel to meet the requirements of the QA program." The proposed program does not state these specific words, however contains the general guidance throughout. For example, Section A.3 states that "Individual managers ensure that personnel	

			working under their management cognizance are provided the necessary training and resources to accomplish their assigned tasks."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Appendices A Organizations & Figures	A.2 Organization	N	Note 4 - The detailed organizational charts contained in the current program are not in the proposed program. 10 CFR 50.54(a)(3)(iv) states that the use of generic organizational charts to indicate functional relationships, authorities, and responsibilities is not a reduction in commitments.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Appendix B Qualification & Experience Requirements for FPL Quality Assurance Personnel	A.5 Personnel Training and Qualification	N	Note 4 - The current program specifically lists the requirements for Quality Managers. The proposed program states that "Generating site and support staff minimum qualification requirements are as delineated in the plant Technical Specifications or other appropriate documents."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Appendix C Baseline Document Matrix	A.7 Regulatory Commitments	N	Note 2 – The following Regulatory Guides are listed in the Baseline Document of the current program but not in the proposed program. However, the commitment to NQA-1 in the proposed program encompasses these commitments. -1.58 Rev. 1 "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel" -1.64 Rev. 2 "Quality Assurance Requirements for the Design of Nuclear Power Plants" -1.74 "Quality Assurance Terms and Definitions" -1.88 Rev. 2 "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records" -1.123 Rev. 1 "QA Requirements for Control of Procurement of Items and Services for Nuclear Power Plants" -1.144 Rev. 1 "Auditing of Quality Assurance Programs for Nuclear Power Plants" -1.146 "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"	
		I - #1	The proposed program has later revisions than the current program for the	

			following Regulatory Guides: -1.28 Rev. 0 versus Rev. 3 "Quality Assurance Program Requirements" -1.116 Rev. 0 versus Rev. 0-R "Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems"	
		N	Note 2 – The proposed program states "NQA-1 contains quality assurance requirements equivalent to those of ANSI N-18.7, and FPL has included in this QATR the remaining "administrative controls" elements from N-18.7 (1976). Therefore, FPL does not commit to compliance with the requirements of ANSI N-18.7." While not directly committing to N-18.7, the commitments in the proposed program fully meet the requirements detailed in the current program.	
		N	Note 2 – A variety of exceptions have been taken by the current program to Regulatory Guides that are also committed to by the proposed program. These	

			exceptions have been evaluated and found to no longer be needed due to one or more of the following: (1) requirement not in NQA-1, (2) the requirement applying to preoperational activities, (3) the exception being covered in NQA-1, (4) the exception being covered in the proposed program, or (5) the exception no longer being needed. The exceptions and Regulatory Guides effected are: Regulatory Guide 1.30 • In lieu of tagging or labeling equipment, FPL chose to control calibration of installed instrumentation and control equipment by maintaining records for each piece of equipment. (4) Regulatory Guide 1.37 • The current program states that "The FPL QA Manual shall require that the weld be covered to prevent entry of moisture and contaminants but will not specify the material to be employed". (1) • The current program states that the "FPL's program allows for wetting of metallic type insulations which are not adversely affected	

			by wetting." (2) Regulatory Guide 1.38 • Restrictions imposed for tapes to be color contrasting will only be applied to the extent that these colors are dissimilar or otherwise distinguishable. (3) • Vapor barrier material shall be colored to contrast. (3) • FPL intends to consider what care is appropriate for each item individually rather than generically classifying the material into protection levels and providing care required of that level. (4) • FPL verifies conformance to procurement documents during receipt inspections. (3) • Required shipping damage inspections may be performed after unloading. (3) • Items that require special handling instructions limited to those items covered in the scope of NUREG 0612. (1) • In lieu of having a program of periodic, documented inspections of rigging and handling equipment, FPL's practice is to have the individual user	

			determine the equipment's acceptability prior to each use. (1) Regulatory Guide 1.39 • In lieu of zone designation, cleanliness is maintained at a level consistent with the work being performed. (4) • Documented cleanliness inspections are performed immediately prior to system closure. (4) Regulatory Guide 1.58 • Personnel participating in testing who take data or make observations, need not be qualified in accordance with ANSI N45.2.6. (3) • Effective with Rev. 4 of the TQAR, all new certifications shall meet the education and experience requirements. (5) • FPL's position is that an initial and periodic review (not to exceed two years) of personnel shall determine the capabilities in his qualified area. (3) Regulatory Guide 1.64 • "Design verification ...(unless the specified design inputs have already been independently	

			verified)." (3) • FPL does not require subsequent (and redundant) evaluations of design Quality Assurance Program policies. (1) Regulatory Guide 1.116 • FPL may employ a M&TE issue log to provide traceability as an option to identification on the inspection record. (1) • For plants in the construction phase temporary use of equipment and facilities may be required...(5) Regulatory Guide 1.123 • Policy concerning nonconformances affecting safety related functions being reviewed and approved by FPL. (3) Regulatory Guide 1.144 • FPL has chosen a two year cycle for auditing elements of the internal and on-site QA Program. (4) • FPL applies a 90 day grace period to supplier annual evaluation...(4) • FPL will not require the pre-audit conference for audits of limited scope. (5) • FPL requires the QA Department to follow-up on all action taken by the QA Department	

			instead of the audited department. (1) Regulatory Guide 1.146 • Lead auditors do not need to participate in a minimum of 5 audits. (4) • 90 day grace period for auditor certifications. (4)	
		I - #2	The proposed program commits to 10CFR Part 72, Subpart G, "Quality Assurance for Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste". The current program did not have this commitment.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Appendix F Topics to be Addressed in Safety Analysis Reports	Introduction	N	Note 3 – The current program states "These stated requirements form a description of the FPL Quality Assurance Program which does not contain identification of the involvement of principal contractors such as the Architect/Engineer, Nuclear Steam Supply System vendor, or Constructor" whereas the proposed program states "Additionally, the requirements of the FPL Quality Assurance Program shall apply to all FPL, contractor, or consultant organizations performing activities..." While not specifically detailed, the current program does apply to "all FPL, contractor, or consultant organizations performing activities affecting the quality of safety related structures, systems, and components..."	
		N	Note 3 – The current program states "In addition, other detailed aspects of the Quality Assurance Program vary from plant-to-plant or with plant site" whereas the proposed program states "This Program shall apply to Duane Arnold Nuclear Plant, Seabrook Station, St. Lucie Nuclear Plant, and Turkey	

			Point Nuclear Plant, and shall be implemented at each plant site throughout the operating life of these nuclear plants."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δs	Basis for Reduction in Commitment Meeting Appendix B
Appendix G QA Program Requirements Specific to St. Lucie Units 1 & 2	APPENDIX A – Plant Operating Review Committee	R - #1	The current program details the responsibilities of the Facility Review Group (FRG) and Company Nuclear Review Board (CNRB). The proposed program eliminates the CNRB and combines functions of the groups into the Onsite Review Group (ORG).	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. The SER for the NMC submittal summarizes the independent bodies that NMC states perform reviews previously performed by the OSRC. The FPL QATR essentially meets all of these SER commitments: 1. ORG will perform the independent review of safety evaluations for changes in the facility as described in the final safety analysis report (FSAR) prior to implementation of the change. ORG will evaluate the effect on safety and if a technical specification (TS) change or NRC review is required. As applicable, the ORG review will be augmented by another review that is completed during the design process. The QATR requires that design verification be performed by any competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization. These reviews verify that changes in the facility do not result in a loss of adequate

				design or safety margins. (See FPL QATR Appendix A and Section B.3) 2. A qualified person, independent of the preparer, will review changes in procedures as described in the FSAR prior to implementation of the change. The procedure review process includes an independent evaluation of changes to determine if a TS change or other NRC approval is required. Independent assessments of selected procedure changes will be performed to verify that procedure reviews and revision controls are effectively implemented. Independent assessments are performed by the Nuclear Oversight Organization to verify effective implementation of procedures and processes. (See FPL QATR Appendix A and Section C). 3. ORG will perform the independent review of TS changes and license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change. (See FPL QATR Appendix A). 4. ORG will perform the independent review of violations, deviations, and reportable events which require reporting to the NRC. This review will include the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event. (See

				FPL QATR App. A) 5. ORG will perform an independent review of any matter related to nuclear safety that is requested by the Site Vice President, Site Director, or plant manager. (See FPL QATR Appendix A). 6. FPL's review and assessment programs include review of significant proposed plant changes or tests, verification that reportable events are promptly investigated and corrected, and look for trends which may not be apparent to the day-to-day observer. The Nuclear Oversight management and management responsible for the areas assessed, will review the results of all independent assessments. (See FPL QATR Appendix A and Section C.3). 7. ORG and the Nuclear Oversight Organization, collectively, will perform the independent review of the corrective actions for significant conditions adverse to quality. Provisions for independent assessments of the audit program are incorporated into the QATR to ensure the effectiveness of the oversight process. (See Appendix A and Section C.3). 8. FPL periodically will perform independent reviews of matters involving the safe operation of its fleet of nuclear plants. (See Section C.1).
		I - #3	The proposed program states "Should a voting member at a particular meeting have direct responsibility for item under	

			review where a conflict of such considerations is likely, that member shall be replaced...by another voting member not having such potential conflict." The current program does not require a voting member to excuse themselves in this situation."	
6.5 REVIEW AND AUDIT				
		R - #2	Many of the details contained in Sections 6.5.1 and 6.5.2 of Appendix G of the current program are not in the proposed program. Appendix A of the proposed program is generic in nature "The ORG meets commensurate with the scope of activities, but minimal frequency requirements are specified in procedures." The current program is more specific "The FRG shall meet at least once per calendar month" and "The CNRB shall meet at least once per calendar quarter during the initial year or unit operation...and at least once per 6 months thereafter." Another example is "Rules for a quorum are established and adhered to" versus "The quorum of the FRG ... shall consist of the Chairman...and four members including alternates" and "The quorum of the CNRB necessary...shall consist of the Chairman ...and at least	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			a majority of CNRB members..."	
		R - #3	The current program states "The FRG shall have voting members composed of individuals from each of the following disciplines..." The proposed program does not include each of the disciplines. Licensing, Instrument and Control, Technical Support and Quality Assurance/Control Services are not included.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #4	The current program states "no more than two alternates shall participate as voting members in FRG activities at any one time." This restriction is not specifically detailed in the proposed program "Alternate chairmen and members may be appointed...to serve on a permanent or temporary basis."	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #5	The current program includes "Review of Fire Protection Program and implementing procedures" under the responsibilities of the FRG. This is not specifically included under the ORG in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #6	The current program states that the FRG shall "Provide written notification within 24 hours to the Chief Nuclear Officer...of disagreement between the FRG and the	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			Plant General Manager..." The proposed program does not specify within 24 hours "Provides written notification to level(s)..."	
6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)	APPENDIX A – Plant Operating Review Committee	R - #1 (same as earlier)	The current program details the responsibilities of the Facility Review Group (FRG) and Company Nuclear Review Board (CNRB). The proposed program eliminates the CNRB and combines functions of the groups into the Onsite Review Group (ORG).	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		I - #4	The proposed program includes "nondestructive testing" and "administrative controls" as areas that the ORG has experience and competence to review. These are not specified in the current program.	
		R - #7	The current program is detailed in regards to CNRB composition "a minimum of five members...have at least 5 years of professional experience...". The proposed program does not have this level of detail "ORG is comprised of a minimum number of members ...All members are qualified in accordance with implementing procedure requirements..."	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		I - #5	The proposed program includes 10CFR72.48 evaluations to be reviewed.	

		R - #1 (same as earlier)	The current program states that "Audits of unit activities shall be performed under the cognizance of the CNRB. These audits shall encompass..." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		I - #6	In regards to what is reviewed by the ORG, the proposed program states that "Any other matter related to nuclear safety requested by the Site Vice President, Site Director, or plant manager, selected by ORG members, or referred to ORG by other organizations." The current program does not have these words."	
6.5.2.9 ST. LUCIE UNIT 2 TECHNICAL REVIEW RESPONSIBILITIES		R - #8	The current program specifies the technical review responsibilities under the cognizance of the CNRB. These responsibilities are not in the proposed program due to the CNRB being eliminated.	SER dated 8/26/99. Transmitted to Mr. J.A. Scalice (TVA) from Mr. H. N. Berkow (NRC). The FPL organization bases this on the elements of (1) a mature operating experience program, (2) an effective corrective action program, and (3) site design and systems engineering organizations, supplemented by other processes and programs described in the QATR.
6.8.2 REVIEW AND APPROVAL OF PROCEDURES	B.14 Document Control	R - #9	Details concerning procedures such as "Each new procedure... shall be independently reviewed by the FRG..." are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
6.8.3 CHANGES TO PROCEDURES	B.14 Document Control	N	Note 3 – The current program states "Procedure revisions shall be approved by the Plant	

			General Manager... prior to implementation." The proposed program is not as specific "Revisions to controlled documents are reviewed for adequacy and approved for release by the same organization..."	
6.10 RECORD RETENTION	B.15 Records	N	Note 3 – The details contained in the current program as to the specific types of records and the length of time for which they shall be retained are not directly in the proposed program. However NQA-1 Non-Mandatory Appendix 17A-1 directly covers the majority of the areas. The one area that is not specifically detailed in NQA-1 concerning "Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records" has been added to the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
1.0 Organization	A.2 Organization		None – Title only	
1.1 GENERAL REQUIREMENTS	A.2 Organization		None	
1.2 IMPLEMENTATION	A.1 Methodology A.2 Organization A.2.1 Corporate Organization A.2.2 Site Organization Appendix A On-Site Review Group	N	Note 4 - The Quality Assurance Program Review Committee is not contained in the proposed program. However, this committee is not required by any regulations.	
1.3 RESPONSIBILITIES	A.2.1 Corporate Organization A.2.2 Site Organization Appendix A On-Site Review Group		None	
1.3.1 Nuclear Division	A.2 Organization A.2.1 Corporate Organization A.2.2 Site Organization	N	Note 3 - Some of the titles and reporting relationships are slightly different (i.e., Plant Vice Presidents versus Site Vice Presidents)	
		I - #7	The proposed program contains the position of Performance Improvement Manager. The current program does have these functions, but does not establish the position of Manager.	
1.3.2 Support Departments	A.2 Organization A.2.1 Corporate Organization A.2.2 Site Organization	N	Note 4 – Some of the departments described in the current program are not described to the same level of detail in	

			the proposed program. These details are described in lower-tier procedures. Among those noted were: - Corporate Records - Transmission Operations - Information Management	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
2.0 Quality Assurance Program	A.5 Personnel Training and Qualification		None – Title only	
2.1 GENERAL REQUIREMENTS	Introduction A.2.1 Corporate Organization A.5 Personnel Training and Qualification C.3 Independent Assessment	N	Most of the words in the current program are contained in NQA-1 Basic Requirement 2. Note 3 - While the specific words "The FPL Quality Assurance Department shall review and approve the Quality Assurance Program of contractors" is not contained in the proposed program, the program does state that QA is responsible for "supplier evaluation".	
2.2 IMPLEMENTATION			None – Title only	
2.2.1 Goals and Objectives	A.1 Methodology A.2 Organization	N	Note 3 – The goals and objectives words as stated in the current program are not specifically included in the proposed program. However, the concepts are in concert with the proposed program philosophy.	
2.2.2 Program Documentation	Introduction A.1 Methodology A.3 Responsibility B.14 Document Control	N	Note 3 – The current program is more prescriptive in the language concerning how revisions to the Topical will be handled.	

			The proposed program states that "Changes to this QATR will be governed and made in compliance with 10CFR50.54(a)."	
		R - #10	The current program states "Quality Instructions shall be reviewed by the Quality Assurance Department at each revision." These words requiring QA review are not in the proposed program, but rather states "Procedures governing generating site activities...are reviewed by qualified persons, other than the preparer, as designated by the Plant Manager."	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
2.2.3 Structures, Systems, and Components	Introduction A.1 Methodology B.8 Test Control B.11 Special Process Control B.12 Inspection		None The current program words are in program or NQA-1 Basic Requirement 2.	
2.2.4 Participating Organizations	A.2 Organization B.4 Procurement Control C.3 Assessments	N	Note 2 – The current program states that the object of procurement reviews is "to verify that the program is in compliance with the applicable requirements of Appendix B, 10CFR50, and ANSI N45.2. The proposed program is in compliance with NQA-1 but does state that "FPL may apply other nationally recognized and NRC endorsed quality standards, such as N45.2, as appropriate to the circumstances of the procurement."	

2.2.5 Indoctrination and Training	A.3 Responsibility A.5 Personnel Training and Qualification	N	Note 3 – The current program has specific details concerning Quality Assurance Indoctrination training whereas the proposed program is more general in stating that FPL "establishes and maintains formal indoctrination and training programs for personnel performing, verifying or managing activities within the scope of the QAP to assure that suitable proficiency is achieved and maintained."	
		N	Note 3 – The current program requires the development of "a training plan which assures that personnel performing activities affecting quality are trained in applicable Quality Instructions and other procedures and in the principles and techniques of the activities being performed." The proposed program does not include the specific training plan words, but details of training are also contained in NQA-1 Supplement 2S-4.	
2.2.6 Management Participation	Appendix A On-Site Review Group	N	Note 3 – The details that are contained in the current program concerning the CNRB are no longer	

			relevant. The CNRB has been replaced. See other portions of this gap analysis for specific details.	
		N	Note 3 – Details of programs of contractor organizations contained in the current program such as "The programs of contractor organizations that perform activities affecting quality shall be reviewed by Quality Assurance to assure that their management regularly reviews the status and adequacy of that part of the FPL Quality Assurance Program which they are executing" are not specifically stated in the proposed program but are covered under NQA-1 requirements.	
2.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 3 – Some details on what each direct report of the Chief Nuclear Officer and Department Heads are responsible for are not contained in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
3.0 Design Control	B.2 Design Control		None – Title only	
3.1 GENERAL REQUIREMENTS	B.2 Design Control		None –	

	B.3 Design Verification		Words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1.	
3.2 IMPLEMENTATION	Introduction B.2 Design Control	N	Note 3 – The details on Safety Related and quality related items that are contained in the current program are not in the proposed program.	
		N	Note 3 – The details on the control of the design organization including areas such as the approving of the QAP prior to release of design input are covered under supplier evaluation of the proposed program.	
		N	Note 3 - The current program states that "A standard PC/M and numbering system shall be established and used at each plant to ensure that all PC/Ms are handled in a uniform manner..." These words are not contained in the proposed program.	
3.2.1 Design Process	B.2 Design Control	R - #11	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, The current program states that "The design organization shall establish procedures to review	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			industry design experience. As appropriate, this experience shall be made available to cognizant design personnel". These specific words are not in the proposed program. However, the program does cover operating experience.	
3.2.2 Design Change Control	B.2 Design Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, Note 3 – The current program states that "design changes shall be reviewed to ensure that implementation of the design change is coordinated with any necessary changes to operating procedures and practices, and required Nuclear Assurance activities, such as inspections and surveillances". These specific words are not in the proposed program.	
3.2.3 Design Interface Control	B.2 Design Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, Note 3 – The specific words in the current program regarding interdisciplinary design "approval documentation of	

			each involved discipline of the design organization shall appear on the design output document or on a separate document directly traceable to the design output. The design organization shall designate a discipline(s) responsible for resolution of the comments..." are not in the proposed program.	
3.2.4 Design Verification	B.3 Design Verification	N	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. Note 3 – Referring to the supervisor performing design verification, the specific words "unless the specified design inputs have already been independently verified" are not in the proposed program.	
		N	Note 3 - The specific words in the current program of "Where reverification is not required for a design change, the bases shall be documented by the design organization" are not in the proposed program.	
		I - #8	In regards to design verification performed by the designer's immediate supervisor, the proposed program includes that the need shall be approved in advance by the supervisor's	

			management and specifies an independent assessment to guard against abuse.	
3.2.5 Computer Programs/Software	B.17 Computer Software Control	I - #9	The proposed program commits to the requirements of NQA-1 Supplement 11S-2 and Subpart 2.7 for computer program testing.	
		N	Note 3 – The specific detail contained in the current program regarding maintaining "instructions or procedures to effect the following..." are not in the proposed program.	
3.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.2.1 Site Vice President (SVP) Appendix A On-Site Review Group A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
4.0 Procurement Document Control	B.4 Procurement Control		None – Title only	
4.1 GENERAL REQUIREMENTS	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 4 and Supplement 4S-1. Note 3 – The specific words "These procedures and instructions shall delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of procurement documents" are not contained in the proposed program.	
4.2 IMPLEMENTATION			None – Heading only	
4.2.1 Procurement Document Provisions	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 4 and Supplement 4S-1. However, Note 3 – The current program details "Consideration shall be given to the need for special requirements in the preparation and review of procurement documents..." and "Special handling, preservation, storage, cleaning, packaging, and	

			shipping requirements shall be specified as appropriate. in the design documents or purchase orders..." are not specifically noted in the proposed program.	
4.2.2 Procurement Document Review	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 4 and Supplement 4S-1. Note 3 - The current program states "This review shall be documented and performed by designated personnel who have been trained and qualified in quality assurance practices and concepts." These specific words are not in the proposed program.	
4.2.3 Selection of Procurement Sources	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirements 4 and 7 and Supplements 4S-1 and 7S-1. However, Note 3 – The current program states "Verbal purchase orders shall be made in accordance with TQAR Appendix C exceptions to ANSI N45.2.13." The proposed program does not address verbal purchase orders.	
		R - #12	The current program requires an annual evaluation of suppliers. The	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			proposed program states "FPL will review the information described therein as it becomes available through its ongoing receipt inspection, operating experience, and supplier evaluation programs, in lieu of an annual basis."	
		R - #13	The proposed program allows for a 90-day grace period for the requirement to audit suppliers on a triennial basis.	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. Also, reference NRC letter from G. S. Vissing to R. C. Mecredy, RG&E, dated July 22, 1998. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in Section B.4 of the QATR "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-years plus 90 days."
		R - #14	The proposed program allows for the acceptance of	FPL may accept of a supplier of commercial grade calibration services

			accreditation in lieu of performing an audit when purchasing commercial grade calibration services from a supplier that has been accredited.	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 NRC letter from D. S. Collins to G. R. Overbeck, APS. Additionally, the SER states that: "When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body ... accreditation may be accepted in lieu of the Purchaser imposing a QA Program consistent with ANSI N45.2-1971, provided all the following are met: 1. The accreditation is to ANSI/ISO/IEC 17025. 2. The accrediting body is either NVLAP or an accrediting body recognized by NVLAP through an MRA. 3. The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. 4. The purchase documents impose additional technical and administrative requirements, as necessary, to satisfy APS QA Program and technical requirements. 5. The purchase documents require reporting as-found calibration data when calibrated items are found to

				be out-of-tolerance." The conditions stated above are met by FPL through Section B.4 of the QATR and lower tier procurement documents.
4.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
5.0 Instructions, Procedures & Drawings			None – Title only	
5.1 GENERAL REQUIREMENTS	A.1 Methodology		None	
5.2 IMPLEMENTATION			None – Title only	
5.2.1 Quality Assurance Program Documents	Introduction	R - #10 (same as earlier)	The current program states "The Quality Assurance Department reviews and comments on Quality Instructions written by other departments. Comments concerning compliance with corporate Quality Assurance commitments and regulatory requirements are resolved prior to issuance. The Quality Assurance Department receives controlled copies of Quality Instructions issued by other departments." These words are not located in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
5.2.2 Procedures and Instructions	Introduction B.14 Document Control Appendix B Procedures	R - #15	The current program states "Also included are maintenance and repair procedures for subcontracted maintenance and repair activities which are outside the normal scope of plant craft capability." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #16	The current program details how Quality Assurance or	1. See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			Quality Control shall review significant changes to operating procedures. This level of detail is not included in the proposed program.	2. (Sections C.1 and C.3) FPL does not commit to perform an independent review for each generating site each year. Instead, either a Quality Assurance expert panel decides which topics (from Table 1) receive independent assessment at what frequency or the topics in Table 1 are audited as a minimum of biennially. This meets Paragraphs 17.3.II.C.2.a, d and e insofar as assessments are planned and periodic, and scheduling is based on status and safety importance.
		R - #17	The current program states "Quality Assurance shall monitor condition report trend reports to determine the need to restore in-line review of procedures by Quality Assurance or Quality Control." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #18	The current program states "Contractor's site procedures and Quality Control inspection procedures shall be approved by the Plant General Manager, or designee, following reviews by Quality Assurance or Quality Control personnel to assure compliance with Corporate commitment and regulatory requirements." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		N	Note 3 –	

			The current program states "During the design, modification, and procurement phases, the Architect/Engineer or other contractors may be delegated responsibility for maintaining, issuing and verifying the implementation of appropriate program documents. In this case, Quality Assurance or Quality Control audit or surveillance activities shall assure that such measures are established and implemented." These words are not located in the proposed program.	
5.2.3 Drawings	B.14 Document Control	N	Note 3 – Specific details of drawing control are not in the proposed program.	
5.2.4 Acceptance Criteria	A.1 Methodology		None	
5.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
6.0 Document Control	B.14 Document Control		None – Title only	
6.1 GENERAL REQUIREMENTS	B.14 Document Control	I - #10	Most of the current program words are contained in the proposed program or NQA-1 Basic Requirement 6 and Supplement 6S-1. The proposed program includes the commitment "Provisions include establishing levels of use..."	
		I - #11	The proposed program includes the commitment "Each site maintains documentation that describes how implementing documents are maintained to assure that QAP requirements are met and are not inadvertently removed in later revisions."	
		I - #12	The proposed program includes the commitment "FPL also establishes programmatic procedure preparation, review and usage controls that ensure procedures are technically and administratively correct. These controls ensure that procedures are reviewed when pertinent source material is revised (such as when Technical Specifications are revised), when unusual incidents occur, when plant modifications are made, and	

			when significant deficiencies are identified."	
6.2 IMPLEMENTATION			None – Header only	
6.2.1 Quality Instructions	B.14 Document Control	N	Note 3 – The current program provides specific details on what Quality Instructions shall provide for. These details are not in the proposed program.	
6.2.2 Drawing Control	B. 14 Document Control	N	Note 3 – The current program states "FPL assumes control of the drawings and Master Drawing List after initial operation of the facility ...Nuclear Engineering shall require that participating design organizations update the drawings and Master Drawing List to reflect the as-built conditions of the facility prior to FPL's acceptance of these documents." These words are not in the proposed program.	
		N	Note 3 – Specific details on maintenance, distribution and control of the drawings contained in the current program are not in the proposed program.	
6.2.3 Design Documents Other Than Drawings	B. 14 Document Control	N	Note 3 –	

			Details on accessibility and use of design documents other than drawings contained in the current program are not in the proposed program.	
6.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
7.0 Control of Purchased Items & Services			None – Title only	
7.1 GENERAL REQUIREMENTS	B.5 Procurement Verification		None – Requirements are contained in the proposed program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	
7.2 IMPLEMENTATION			None – Header only	
7.2.1 Evaluation of Suppliers	B.4 Procurement Control B.5 Procurement Verification	N	Note 3 – The words in the current program of "This evaluation is to ensure that the FPL contractors comply with the applicable portions of 10 CFR 50, Appendix B. Documented evidence of the evaluation, and the acceptance of the contractor's quality program and procedures shall be retained in the Quality Assurance Department files" are not located in the proposed program.	
7.2.2 Verification Activities	B.4 Procurement Control B.5 Procurement Verification	N	Note 3 – The words in the current program of "FPL verification activities ...shall be performed on those items where verification of procurement requirements cannot be determined upon receipt" could not be	

			located. These specific words are not in the proposed program.	
7.2.3 Receiving Inspection	A.5 Personnel Training and Qualification B.4 Procurement Control B.12 Inspection	N	Note 3 – The specific details on what receiving inspection includes in the current program are not in the proposed program.	
7.2.4 Supplier Furnished Records	B.4 Procurement Control		None – Requirements are contained in the proposed program or NQA-1 Basic Requirements 4 and 7 and Supplements 4S-1 and 7S-1.	
7.2.5 Release for Use or Installation	B.4 Procurement Control	R – #19	The current program states that "Documentary evidence that material and equipment conforms to the procurement requirements shall be available at the plant site prior to installation or use of such material or equipment" whereas the proposed program takes exception to this and states "documentary evidence that items conform to procurement requirements need not be available at the site prior to item installation, but will be available at the site prior to placing reliance on the item for its intended safety function."	This conforms to both Criterion VII of 10 CFR 50, Appendix B, and with Section 8.1 of Supplement 7S-1 of NQA-1-1994 insofar as both Criterion VII and Section 8.1 allow the item to be installed provided that the documentary evidence is available at the nuclear facility site prior to use of the item.
		N	Note 3 - Specific details on release for use or installation included in the current	

			program are not in the proposed program	
7.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.e Vice President Integrated Supply Chain A.2.2.1 Site Vice President (SVP)	N	Note 4 - Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
8.0 Identification of Control of Material, Parts & Components	B.6 Identification and Control of Items		None – Title only	
8.1 GENERAL REQUIREMENTS	B.6 Identification and Control of Items		None – Requirements contained in the proposed program or NQA-1 Basic Requirement 8 and Supplement 8S-1.	
8.2 IMPLEMENTATION	A.3 Responsibility B.6 Identification and Control of Items	N	Note 3 – The current program states "This shall include welding material traceability to the point of consumption". These specific words are not in the proposed program.	
		N	Note 3 – The specific provisions concerning identification and control contained in the current program are not in the proposed program.	
8.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.e Vice President Integrated Supply Chain A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
9.0 Control of Special Processes	B.11 Special Process Control		None – Title only	
9.1 GENERAL REQUIREMENTS	B.11 Special Process Control		None	
9.2 IMPLEMENTATION	B.11 Special Process Control	N	Note 3 – The words in the current program "Special process requirements shall be included in design outputs and changes thereto" are not in the proposed program.	
9.2.1 Identification of Special Processes	B.11 Special Process Control	N	Note 3 – The details in the current program of "Others, (e.g., flushing, protective coating, plating applications and nuclear cleaning) should be reviewed to determine if they are special processes" are not in the proposed program.	
9.2.2 Procedure Qualification and Control	B.11 Special Process Control	N	Note 3 – The words in the current program of "Where FPL assigns work to outside contractors, the contractors shall make their procedures and personnel qualifications available for review to FPL prior to the start of work...The contractor shall also be responsible for the control and approval of sub-contractor procedures" are not specifically in the	

			proposed program.	
		N	Note 3 - The details on special process procedures in the current program (i.e., sufficiently detailed for a qualified person, etc.) are not in the proposed program.	
		R – #20	The words "Special process and procedures and revisions thereto which specify acceptance criteria...shall have the concurrence of the acceptance criteria by Nuclear Engineering prior to issuance and use" are not in the proposed program.	Section 3.2 of Supplement 9S-1 of NQA-1-1994 requires acceptance criteria for special processes to be specified or referenced in procedures or instructions. Section A.2.1.2.c of the proposed program assigns the responsibility to the Vice President Nuclear Engineering for nuclear plant engineering which includes the provision of acceptance criteria.
9.2.3 Personnel Qualification and Certification	B.11 Special Process Control	N	Note 3 – Details on "requirements for the period of certification, retesting, and recertification of personnel" are not in the proposed program.	
		N	Note 3 – Details on how contractors shall qualify personnel and maintain records are not in the proposed program.	
9.2.4 Control of Equipment	B.11 Special Process Control	N	Note 3 – The specific words in the current program "Equipment that must be of a specific type, range, or accuracy to provide conformance to specified requirements shall	

			be controlled to ensure that it is qualified, maintained, and calibrated in accordance with those requirements" is not in the proposed program.	
9.2.5 Special Process Records	B.11 Special Process Control	N	Note 3 – The specific words in the current program "Results of nondestructive examinations shall be documented and shall be evaluated for acceptance in accordance with applicable specifications, codes and standards by an individual who is certified in the applicable method" are not in the proposed program.	
		N	Note 3 – Details on record retention for contracted work in the current program, "Records shall also be maintained for verification activities when required by procedure, code or specification. For contracted work, these records shall be retained by the vendor or supplied to FPL, as required by contract or purchase order..." are not in the proposed program.	
9.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
10.0 Inspection	B.12 Inspection		None – Title only	
10.1 GENERAL REQUIREMENTS	B.12 Inspection	N	Most of the requirements contained in the proposed program or NQA-1 Basic Requirement 10 and Supplement 10S-1. Note 3 – The specific words "Examinations, measurements and tests of materials or products processed shall be performed for each work operation, where necessary, to assure conformance to established requirements" are not in the proposed program.	
10.2 IMPLEMENTATION			None – Header only	
10.2.1 Inspection Program	B.12 Inspection	N	Note 3 – Specific detail in the current program such as "For preoperational start-up and testing of plant modifications, Nuclear Division personnel may report functionally..." and "Transmission Operations personnel may perform inspections of equipment within their purview during operations..." are not in the proposed program.	

10.2.2 Inspection Plans and Schedules	B.12 Inspection	N	Note 3 – Specific details in the current program concerning planning such as "Documented inspection plans may be either a separate document or an integral part of work instruction documents..." and "The plans shall be based on design specifications, procurement documents..." are not in the proposed program.	
		N	Note 3 – The current program words "Inspection planning should include a review for the acceptability of sampling" are not in the proposed program.	
10.2.3 Inspection Personnel	B.12 Inspection	N	Most of the requirements contained in the proposed program or NQA-1 Basic Requirement 10 and Supplement 10S-1. Note 3 – The current program words "Prior to performing inspections, inspection personnel shall have access to the drawings, procedures, specifications, or other documented criteria necessary for performance of the inspection" are not in the proposed program.	
10.2.4 Inspection Procedures	B.12 Inspection		Much of the detail contained	

		N	in the proposed program or NQA-1 Basic Requirement 10 and Supplement 10S-1. Note 3 – Details in the current program concerning inspection procedures "Inspection procedures, instructions or checklists shall contain the following:..." are not in the proposed program.	
		R – #21	The words in the current program "Inspection procedures shall be reviewed by Nuclear Assurance personnel or for NDE by Engineering personnel to determine the need for an independent inspection and the degree and method if such an inspection is required, and to assure the identification of inspection personnel and the method of documentation of inspection results" are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
10.2.5 Inspection, Witness, and Hold Point Identification	B.12 Inspection	N	Note 3 – The words in the current program "These process procedures are subject to the review of the Quality Control organization for adequacy of inspection, witness, and hold points" are not in the proposed program.	
		R – #22	The words in the current	See the above discussion regarding

			program "FPL procurement documents shall indicate FPL witness or hold points applicable prior to during, or after the manufacture of an item or the performance of a service. A distinction shall be made between witness points and mandatory hold points" are not in the proposed program. (Note: The proposed program does not distinguish between hold and witness points).	10 CFR 50.54(a)(3)(ii).
10.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
11.0 Test Control	B.8 Test Control		None – Title only	
11.1 GENERAL REQUIREMENTS	B.8 Test Control		None	
11.2 IMPLEMENTATION			None – Header only	
11.2.1 Test Program	A.3 Responsibility B.8 Test Control	N	Much of the detail contained in the proposed program or NQA-1 Basic Requirement 11 and Supplement 11S-1. Note 3 – The specific words in the current program "Retest following repairs, replacements, or modification shall be performed in accordance with the original design and test requirements or acceptable alternatives. Retest shall be performed when the original test results are invalidated. A schedule shall be provided and maintained to provide assurance that all tests are performed and properly evaluated on a timely basis" are not in the proposed program.	
11.2.2 Test Procedure Preparation and Test Performance	B.8 Test Control	N	Note 3 – Details contained in the current program, such as "Testing shall be accomplished in accordance	

			with written approved test procedures which incorporate or reference the requirements and acceptance limits in the applicable design and procurement documents" are not in the proposed program.	
		N	Note 3 – The specific words in the current program "Test procedures shall be revised as necessary to assure that tests are performed in accordance with the latest approved information" are not in the proposed program. However, document control requirements require activities be performed to the latest revision.	
		R - #23	The current program includes "Specific measuring and test equipment utilized for testing; and As found and as left condition (as applicable)" as items that test records shall identify. These are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
11.2.3 Evaluation of Test Results	A.3 Responsibility B.8 Test Control		The detail is contained in the proposed program or NQA-1 Basic Requirement 11 and Supplement 11S-1.	
11.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located	

			in lower tier documents of the proposed program.	
		N	Note 4 – The Director Transmission Operation is listed in the current program. This position is not listed in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
12.0 Control of Measuring & Test Equipment	B.9 Measuring and Test Equipment Control		None – Title only	
12.1 GENERAL REQUIREMENTS	B.9 Measuring and Test Equipment Control	N	Much of the detail contained in the proposed program or NQA-1 Basic Requirement 12 and Supplement 12S-1. Note 3 – The words "It is the responsibility of each department maintaining calibrated instruments to provide for the calibration and control of such instruments" are not in the proposed program.	
12.2 IMPLEMENTATION			None – Header only	
12.2.1 Calibration and Control of Measuring and Test Equipment	B.3 Responsibility B.9 Measuring and Test Equipment Control	N	IEEE 498 paragraph 5.2 specifies environmental controls. Note 3 – The specific level of detail in the current program as to what M&TE control procedures or calibration program documents shall contain "M&TE control procedures or calibration program documents shall contain the following..." are not in the proposed program.	
12.2.2 Calibration Procedure	B.9 Measuring and Test Equipment	N	Note 3 –	

	Control		The specific level of detail in the current program as to what M&TE control procedures or calibration program documents shall contain "Calibration procedures shall contain, or reference as a minimum..." are not in the proposed program.	
12.2.3 Calibration Standards	B.9 Measuring and Test Equipment Control	N	Most of the detail contained in the proposed program or NQA-1 Basic Requirement 12 and Supplement 12S-1. Note 3 – The words in the current program "The accuracies of M&TE and reference standards shall be chosen such that the equipment being calibrated can be calibrated and maintained within the required tolerances" are not in the proposed program.	
12.2.4 "Out of Tolerance" Control and Corrective Action	B.9 Measuring and Test Equipment Control		None	
12.3 RESPONSIBILITIES	A.2 Organization	N	Note 4 – The Director Transmission Operation is listed in the current program. This position is not listed in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
13.0 Handling, Storage & Shipping	B.7 Handling, Storage and Shipping		None – Title only	
13.1 GENERAL REQUIREMENTS	B.7 Handling, Storage and Shipping		None – Requirements contained in the proposed program or NQA-1 Basic Requirement 13, Supplement 13S-1 or NQA-1 Subpart 2.2.	
13.2 IMPLEMENTATION			None – Header only	
13.2.1 General	A.3 Responsibility	N	Note 3 – The current program words "Instructions or procedures shall be written to define the requirements...and shall require implementation of the established design and specification requirements by personnel having appropriate qualifications" are not in the proposed program.	
13.2.2 Handling, Storage, and Shipping Procedures	B.7 Handling, Storage and Shipping	N	Most of the requirements contained in the proposed program or NQA-1 Basic Requirement 13, Supplement 13S-1 or NQA-1 Subpart 2.2. Note 3 – The words "by environmental conditions" included in the current program when describing	

			damage, loss, or deterioration are not in the proposed program.	
13.2.3 Cleanness Procedures	B.7 Handling, Storage and Shipping		None	
13.2.4 Housekeeping Procedures	B.7 Handling, Storage and Shipping		None	
13.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.e Vice President Integrated Supply Chain A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
14.0 Inspection, Test & Operating Status	B.10 Inspection, Test and Operating Status		None – Title only	
14.0 GENERAL REQUIREMENTS (NOTE: Number is incorrect)	B.10 Inspection, Test and Operating Status		None	
14.2 IMPLEMENTATION			None – Header only	
14.2.1 General	B.10 Inspection, Test and Operating Status	N	Note 3 – The detailed words in the current program "The Architect/Engineer or Contractors shall develop and implement procedures to comply with contractual responsibilities, and applicable codes, standards, specifications, and criteria...Elements of this system require that suppliers and contractors have a controlled manufacturing and test operation" are not in the proposed program.	
		N	Note 3 – The specific words in the current program referring to a controlled manufacturing and test operation "Methods to verify adequacy of the controls shall be established and implemented, as appropriate" are not located in the proposed program.	
14.2.2 Status Identification and	B.10 Inspection, Test and Operating		Most of the requirements	

Control	Status			
		N	contained in the proposed program or NQA-1 Basic Requirement 14. Note 3 – Some details regarding control of the application and removal of marking in the current program "and to prevent omission of inspections, tests, or other critical operations" are not in the proposed program.	
		R – #24	The words in the current program "These procedures shall require independent verifications, where appropriate to ensure that necessary measures have been implemented" are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
14.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
15.0 Nonconforming Materials, Parts or Components	B.13 Corrective Action		None – Title only	
15.1 GENERAL REQUIREMENTS	B.13 Corrective Action		Requirements contained in NQA-1 Basic Requirement 15 and Supplement 15S-1.	
15.2 IMPLEMENTATION			None – Header only	
15.2.1 Program	A.3 Responsibility A.6 Corrective Action B.13 Corrective Action		Requirements contained in NQA-1 Basic Requirement 15 and Supplement 15S-1.	
15.2.2 Documenting and Controlling Nonconformances	A.6 Corrective Action B.13 Corrective Action	N	Note 3 – The specific words in the current program "The control of, and the documentation generated by the identification, disposition, correction, and verification of nonconformances may be transferred between processing methods..." are not in the proposed program. Note: This is removing a permissive.	
		N	Note 3 – The details contained in the current program on what measures to document and control nonconformances shall include are not in the proposed program.	
15.2.3 Documentation	A.6 Corrective Action B.13 Corrective Action	N	Note 3 –	

			The specific words in the current program "Documentation of the nonconforming item shall: identify the item; describe the nonconformance..." are not in the proposed program.	
15.2.4 Evaluation and Disposition	A.6 Corrective Action B.13 Corrective Action	N	Most of the requirements contained in NQA-1 Basic Requirement 15 and Supplement 15S-1. Note 3 – The specific details of the evaluation and disposition of nonconformances in the current program are not in the proposed program.	
15.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current OAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
16.0 Corrective Action	A.6 Corrective Action B.13 Corrective Action		None – Title only	
16.1 GENERAL REQUIREMENTS	A.6 Corrective Action	I - #13	Most of the requirements are contained in the proposed program and NQA-1 Basic Requirement 16. The proposed program requires "Provisions are also made to ensure that corrective actions for significant conditions adverse to quality are completed as intended and are not inadvertently nullified by subsequent actions."	
16.2 IMPLEMENTATION			None – Header only	
16.2.1 Corrective Action and Follow-Up	A.6 Corrective Action	N	Most of the requirements are contained in the proposed program and NQA-1 Basic Requirement 16. Note 3 - The specific details in the current program concerning actions to take when an adverse condition is detected are not in the proposed program.	
		N	Note 3 – Details in this section such	

			as "Interdepartmental corrective action shall be requested by use of written correspondence. Audit reports, condition reports, nonconformance reports, interoffice letters, and other documents may be used for this purpose" are not in the proposed program.	
		N	Note 3 - The words "Where corrective action is required of contractor personnel, FPL shall define in procedures and contracts the corrective action interface..." are not in the proposed program. Note: This is a normal item to be included in contracts.	
16.2.2 Recurrence Control	A.6 Corrective Action		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 16.	
16.2.3 Incidents and Reportable Events Reporting	A.6 Corrective Action	N	Note 3 – Specific details in this section concerning operating reportable events and reports of incidents are not in the proposed program.	
16.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

		N	Note 3 and 4 – The details on responsibility in the current program for commitment tracking "The Vice Presidents, PSL, PTN, and Nuclear Operations Support are responsible for administering a commitment tracking system" are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
17.0 Quality Assurance Records	B.15 Records		None – Title only	
17.1 GENERAL REQUIREMENTS	B.15 Records	N	Note 3 – The "such as" list of records included in the current program "The records shall include, as appropriate, data such as qualifications of personnel..." are not in the proposed program.	
		N	Note 3 – Specific details in the current program on how FPL will implement record control (i.e., FPL will implement Write Once Read Many (WORM) optical media...) are not in the proposed program.	
17.2 IMPLEMENTATION			None – Header only	
17.2.1 Records Identification and Classification	B.15 Records		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 17 and Supplement 17S-1.	
17.2.2 Completeness and Control	B.15 Records		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 17 and	

			Supplement 17S-1. Note: Many of the requirements are covered in Sections 2.2 and 2.6 of 17S-1.	
17.2.3 Retrieval	B.15 Records		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 17 and Supplement 17S-1.	
17.2.4 Storage	B.15 Records	I – #14	The QARSET concept for evaluation of records described in the current program is not included in the proposed program.	
17.3 RESPONSIBILITIES	A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program. Specifically, the current program identifies a Records Official, the Corporate Records Supervisor, and The Quality Assurance Record Storage Evaluation Team. The proposed program does not define these titles.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
18.0 Audits			None – Title only	
18.1 GENERAL REQUIREMENTS	C. ASSESSMENT		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 18.	
		I - #15	The proposed program commits to "periodically performs independent reviews of matters involving the safe operation of its fleet of nuclear power plants, with a minimum of one such review being conducted for each generating site each year..."	
18.2 IMPLEMENTATION	C. ASSESSMENT		None – The requirements are contained in the program and NQA-1 Basic Requirement 18.	
18.2.1 Personnel	C. ASSESSMENT		None – The requirements are contained in the program and NQA-1 Basic Requirement 18.	
18.2.2 Planning and Scheduling	C. ASSESSMENT	R - #25	The current program states "Audits of selected aspects of operational phase activities are performed with a frequency commensurate with safety significance and performance. As a	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			minimum...these audits shall are performed at a biennial (2-year) frequency." The proposed program is performance based as detailed in Table 1.	
	C. ASSESSMENT	I - #16	The proposed program details the performance of self-assessments "performed by or for the group responsible for the activity being assessed."	
18.2.3 Conduct of Audits	C. ASSESSMENT	I - #17	The proposed program requires "independent assessments include examination of selected procedures to verify that the procedure review and revision controls...are effectively implemented."	
18.2.4 Reporting of Audit Findings	C. ASSESSMENT	R - #26	The current program requirement to transmit audit reports within 30 calendar days is not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
18.2.5 Follow-up	C. ASSESSMENT	R - #27	The requirement to provide a written response within 30 calendar days in the current program is not in the proposed program.	1. See the above discussion regarding 10 CFR 50.54(a)(3)(ii). 2. Section 6 of Supplement 18S-1 of NQA-1-1994 requires the audited organization to schedule corrective action and for the auditing organization to evaluate the audit responses. 3. This meets Criterion XVIII of 10 CFR 50, Appendix B, insofar as follow-up actions are taken where indicated.
18.2.6 Reports to Management	C. ASSESSMENT	R – #1 (same as earlier)	The requirement in the current program to periodically report on the	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			status of the Quality Program to members of the CNRB is not in the proposed program.	
18.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
St.. Lucie Unit 1 Facility Operating License Amendment No. 158 St. Lucie Unit 2 Facility Operating License Amendment No. 97 (NOTE: Wording is identical in these documents).	Introduction B.14 Document Control	N	Note 3 – The specific details on procedure review and document control measures for the current procedure change process are not in the proposed program.	

Legend:

Note 1 - "I" – Increase in commitment
"N" – Not a Reduction in commitment
"R" – Reduction in commitment

Note 2 – Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to the Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.

Note 3 - Methodology details (the "how") in the current program description are not included in the proposed QATR. The intent of the QATR is to establish appropriate/sufficient requirements (the "what") to provide a quality assurance program meeting 10CFR50, Appendix B, but to allow flexibility in how the requirements are met. Therefore, this change in methodology detail (the "how") is not considered to be a reduction in commitment.

Note 4 - The QATR does not assign responsibilities beyond those listed in Section A.2 and A.3. The responsibilities listed in the current QATR are documented in lower tier documents.

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Abstract	Introduction A.1 Methodology		None	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Introduction	Introduction A.1 Methodology	N	Note 3 - The proposed topical states that "Portions of the FPL Quality Assurance Program requirements are also applicable to Quality Related items and services". The current topical does not include this language in the Introduction but rather includes it in TQR 2.0 "...Portions of the FPL Quality Assurance Program requirements are also applicable to Quality Related items or services..." Introduction and definition of "Quality Related" in Appendix C. An expanded explanation of the applicability of the FPL Quality Assurance Topical Report is provided.	
		N	Note 2 – The current program states that it shall be applicable to all existing nuclear plants and those under construction. The proposed program is specific in naming the operating plants to which it applies.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
TQR Program Policy Quality Assurance Program Policy	Policy Statement A.2.1 Corporate Organization A.3 Responsibility	N	Note 3 - The current program states that FPL will merit public confidence by providing electricity in a reliable and safe manner. These specific words are not in the proposed program. However, these words are not required by regulatory documents.	
		N	Note 3 – The current program states that "The head of each organization performing quality related activities is responsible for: identifying those activities within their organization which are quality related as defined by the QA Program; establishing and clearly defining the duties and responsibilities of personnel within their organization who execute those quality related activities; and planning, selecting, and training personnel to meet the requirements of the QA program." The proposed program does not state these specific words, however contains the general guidance throughout. For example, Section A.3 states that "Individual managers ensure that personnel	

			working under their management cognizance are provided the necessary training and resources to accomplish their assigned tasks."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Appendices A Organizations & Figures	A.2 Organization	N	Note 4 - The detailed organizational charts contained in the current program are not in the proposed program. Note: 10 CFR 50.54(a)(3)(iv) states that the use of generic organizational charts to indicate functional relationships, authorities, and responsibilities is not a reduction in commitments.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/A (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Appendix B Qualification & Experience Requirements for FPL Quality Assurance Personnel	A.5 Personnel Training and Qualification	N	Note 4 - The current program specifically lists the requirements for Quality Managers. The proposed program states that "Generating site and support staff minimum qualification requirements are as delineated in the plant Technical Specifications or other appropriate documents."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Appendix C Baseline Document Matrix	A.7 Regulatory Commitments	N	Note 2 – The following Regulatory Guides are listed in the Baseline Document of the current program but not in the proposed program. However, the commitment to NQA-1 in the proposed program encompasses these commitments. -1.58 Rev. 1 "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel" -1.64 Rev. 2 "Quality Assurance Requirements for the Design of Nuclear Power Plants" -1.74 "Quality Assurance Terms and Definitions" -1.88 Rev. 2 "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records" -1.123 Rev. 1 "QA Requirements for Control of Procurement of Items and Services for Nuclear Power Plants" -1.144 Rev. 1 "Auditing of Quality Assurance Programs for Nuclear Power Plants" -1.146 "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"	
		I - #1	The proposed program has later revisions than the current program for the	

			following Regulatory Guides: -1.28 Rev. 0 versus Rev. 3 "Quality Assurance Program Requirements" -1.116 Rev. 0 versus Rev. 0-R "Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems"	
		N	Note 2 – The proposed program states "NQA-1 contains quality assurance requirements equivalent to those of ANSI N-18.7, and FPL has included in this QATR the remaining "administrative controls" elements from N-18.7 (1976). Therefore, FPL does not commit to compliance with the requirements of ANSI N-18.7." While not directly committing to N-18.7, the commitments in the proposed program fully meet the requirements detailed in the current program.	
		N	Note 2 – A variety of exceptions have been taken by the current program to Regulatory Guides that are also committed to by the proposed program. These	

			exceptions have been evaluated and found to no longer be needed due to one or more of the following: (1) requirement not in NQA-1, (2) the requirement applying to preoperational activities, (3) the exception being covered in NQA-1, (4) the exception being covered in the proposed program, or (5) the exception no longer being needed. The exceptions and Regulatory Guides effected are: Regulatory Guide 1.30 • In lieu of tagging or labeling equipment, FPL chose to control calibration of installed instrumentation and control equipment by maintaining records for each piece of equipment. (4) Regulatory Guide 1.37 • The current program states that "The FPL QA Manual shall require that the weld be covered to prevent entry of moisture and contaminants but will not specify the material to be employed". (1) • The current program states that the "FPL's program allows for wetting of metallic type insulations which are not adversely affected	

			by wetting." (2) Regulatory Guide 1.38 • Restrictions imposed for tapes to be color contrasting will only be applied to the extent that these colors are dissimilar or otherwise distinguishable. (3) • Vapor barrier material shall be colored to contrast. (3) • FPL intends to consider what care is appropriate for each item individually rather than generically classifying the material into protection levels and providing care required of that level. (4) • FPL verifies conformance to procurement documents during receipt inspections. (3) • Required shipping damage inspections may be performed after unloading. (3) • Items that require special handling instructions limited to those items covered in the scope of NUREG 0612. (1) • In lieu of having a program of periodic, documented inspections of rigging and handling equipment, FPL's practice is to have the individual user	

			determine the equipment's acceptability prior to each use. (1) Note: Regarding Regulatory Guide 1.38, FPL takes exception to Section 6.2.4 of Subpart 2.2 of ASME NQA-1-1994. This is an additional exception that is not contained in NMC-1. Section 6.2.4 prohibits the use or storage of food, drinks, and salt tablet dispensers in controlled storage areas. Instead, the use and storage of these items shall be controlled and limited to designated areas where such use or storage is not deleterious to stored items. This meets Criterion XIII of 10 CFR 50, Appendix B insofar as measures have been established to prevent damage or deterioration during storage of material and equipment. Regulatory Guide 1.39 • In lieu of zone designation, cleanliness is maintained at a level consistent with the work being performed. (4) • Documented cleanliness inspections are performed immediately prior to system closure. (4) Regulatory Guide 1.58	

			• Personnel participating in testing who take data or make observations, need not be qualified in accordance with ANSI N45.2.6. (3) • Effective with Rev. 4 of the TQAR, all new certifications shall meet the education and experience requirements. (5) • FPL's position is that an initial and periodic review (not to exceed two years) of personnel shall determine the capabilities in his qualified area. (3) Regulatory Guide 1.64 • "Design verification ...(unless the specified design inputs have already been independently verified)." (3) • FPL does not require subsequent (and redundant) evaluations of design Quality Assurance Program policies. (1) Regulatory Guide 1.116 • FPL may employ a M&TE issue log to provide traceability as an option to identification on the inspection record. (1) • For plants in the construction phase temporary use of equipment and facilities may be required...(5)	

			Regulatory Guide 1.123 • Policy concerning nonconformances affecting safety related functions being reviewed and approved by FPL. (3) Regulatory Guide 1.144 • FPL has chosen a two year cycle for auditing elements of the internal and on-site QA Program. (4) • FPL applies a 90 day grace period to supplier annual evaluation...(4) • FPL will not require the pre-audit conference for audits of limited scope. (5) • FPL requires the QA Department to follow-up on all action taken by the QA Department instead of the audited department. (1) Regulatory Guide 1.146 • Lead auditors do not need to participate in a minimum of 5 audits. (4) • 90 day grace period for auditor certifications. (4)	
		I - #2	The proposed program commits to 10CFR Part 72, Subpart G, "Quality Assurance for Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive	

			Waste". The current program did not have this commitment.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Q's	Basis for Reduction in Commitment Meeting Appendix B
Appendix F Topics to be Addressed in Safety Analysis Reports	Introduction	N	Note 3 – The current program states "These stated requirements form a description of the FPL Quality Assurance Program which does not contain identification of the involvement of principal contractors such as the Architect/Engineer, Nuclear Steam Supply System vendor, or Constructor" whereas the proposed program states "Additionally, the requirements of the FPL Quality Assurance Program shall apply to all FPL, contractor, or consultant organizations performing activities..." While not specifically detailed, the current program does apply to "all FPL, contractor, or consultant organizations performing activities affecting the quality of safety related structures, systems, and components..."	
		N	Note 3 – The current program states "In addition, other detailed aspects of the Quality Assurance Program vary from plant-to-plant or with plant site" whereas the proposed program states "This Program shall apply to Duane Arnold Nuclear Plant, Seabrook Station, St. Lucie Nuclear Plant, and Turkey	

			Point Nuclear Plant, and shall be implemented at each plant site throughout the operating life of these nuclear plants."	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
Appendix G QA Program Requirements Specific to St. Lucie Units 1 & 2				This section is NOT applicable to Turkey Point. See UFSAR Section 12 at the end of this matrix for discussion on Plant Nuclear Safety Committee, etc.
6.5 REVIEW AND AUDIT				
6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)				
6.8.2 REVIEW AND APPROVAL OF PROCEDURES				
6.8.3 CHANGES TO PROCEDURES				
6.10 RECORD RETENTION				

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
1.0 Organization	A.2 Organization		None – Title only	
1.1 GENERAL REQUIREMENTS	A.2 Organization		None	
1.2 IMPLEMENTATION	A.1 Methodology A.2 Organization A.2.1 Corporate Organization A.2.2 Site Organization Appendix A On-Site Review Group	N	Note 4 - The Quality Assurance Program Review Committee is not contained in the proposed program. However, this committee is not required by any regulations.	
1.3 RESPONSIBILITIES	A.2.1 Corporate Organization A.2.2 Site Organization Appendix A On-Site Review Group		None	
1.3.1 Nuclear Division	A.2 Organization A.2.1 Corporate Organization A.2.2 Site Organization	N	Note 3 - Some of the titles and reporting relationships are slightly different (i.e., Plant Vice Presidents versus Site Vice Presidents)	
		I - #3	The proposed program contains the position of Performance Improvement Manager. The current program does have these functions, but does not establish the position of Manager.	
1.3.2 Support Departments	A.2 Organization A.2.1 Corporate Organization A.2.2 Site Organization	N	Note 4 – Some of the departments described in the current program are not described to the same level of detail in	

			the proposed program. These details are described in lower-tier procedures. Among those noted were: - Corporate Records - Transmission Operations - Information Management	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment: Meeting Appendix B
2.0 Quality Assurance Program	A.5 Personnel Training and Qualification		None – Title only	
2.1 GENERAL REQUIREMENTS	Introduction A.2.1 Corporate Organization A.5 Personnel Training and Qualification C.3 Independent Assessment	N	Most of the words in the current program are contained in NQA-1 Basic Requirement 2. Note 3 - While the specific words "The FPL Quality Assurance Department shall review and approve the Quality Assurance Program of contractors" is not contained in the proposed program, the program does state that QA is responsible for "supplier evaluation".	
2.2 IMPLEMENTATION			None – Title only	
2.2.1 Goals and Objectives	A.1 Methodology A.2 Organization	N	Note 3 – The goals and objectives words as stated in the current program are not specifically included in the proposed program. However, the concepts are in concert with the proposed program philosophy.	
2.2.2 Program Documentation	Introduction A.1 Methodology A.3 Responsibility B.14 Document Control	N	Note 3 – The current program is more prescriptive in the language concerning how revisions to the Topical will be handled.	

			The proposed program states that "Changes to this QATR will be governed and made in compliance with 10CFR50.54(a)."	
		R - #1	The current program states "Quality Instructions shall be reviewed by the Quality Assurance Department at each revision." These words requiring QA review are not in the proposed program, but rather states "Procedures governing generating site activities...are reviewed by qualified persons, other than the preparer, as designated by the Plant Manager."	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. The SER for the NMC submittal summarizes the independent bodies that NMC states perform reviews previously performed by the OSRC. The FPL QATR essentially meets all of these SER commitments: 1. ORG will perform the independent review of safety evaluations for changes in the facility as described in the final safety analysis report (FSAR) prior to implementation of the change. ORG will evaluate the effect on safety and if a technical specification (TS) change or NRC review is required. As applicable, the ORG review will be augmented by another review that is completed during the design process. The QATR requires that design verification be performed by any competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization.

				These reviews verify that changes in the facility do not result in a loss of adequate design or safety margins. (See FPL QATR Appendix A and Section B.3) 2. A qualified person, independent of the preparer, will review changes in procedures as described in the FSAR prior to implementation of the change. The procedure review process includes an independent evaluation of changes to determine if a TS change or other NRC approval is required. Independent assessments of selected procedure changes will be performed to verify that procedure reviews and revision controls are effectively implemented. Independent assessments are performed by the Nuclear Oversight Organization to verify effective implementation of procedures and processes. (See FPL QATR Appendix A and Section C). 3. ORG will perform the independent review of TS changes and license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change. (See FPL QATR Appendix A). 4. ORG will perform the independent review of violations, deviations, and reportable events which require reporting to the NRC. This review will include the results of investigations and recommendations resulting from

				such investigations to prevent or reduce the probability of recurrence of the event. (See FPL QATR App. A) 5. ORG will perform an independent review of any matter related to nuclear safety that is requested by the Site Vice President, Site Director, or plant manager. (See FPL QATR Appendix A). 6. FPL's review and assessment programs include review of significant proposed plant changes or tests, verification that reportable events are promptly investigated and corrected, and look for trends which may not be apparent to the day-to-day observer. The Nuclear Oversight management and management responsible for the areas assessed, will review the results of all independent assessments. (See FPL QATR Appendix A and Section C.3). 7. ORG and the Nuclear Oversight Organization, collectively, will perform the independent review of the corrective actions for significant conditions adverse to quality. Provisions for independent assessments of the audit program are incorporated into the QATR to ensure the effectiveness of the oversight process. (See Appendix A and Section C.3). 8. FPL periodically will perform independent reviews of matters involving the safe operation of its fleet of nuclear plants. (See Section C.1).
2.2.3 Structures, Systems, and Components	Introduction A.1 Methodology		None	

	B.8 Test Control B.11 Special Process Control B.12 Inspection		The current program words are in program or NQA-1 Basic Requirement 2.	
2.2.4 Participating Organizations	A.2 Organization B.4 Procurement Control C.3 Assessments	N	Note 2 – The current program states that the object of procurement reviews is "to verify that the program is in compliance with the applicable requirements of Appendix B, 10CFR50, and ANSI N45.2. The proposed program is in compliance with NQA-1 but does state that "FPL may apply other nationally recognized and NRC endorsed quality standards, such as N45.2, as appropriate to the circumstances of the procurement."	
2.2.5 Indoctrination and Training	A.3 Responsibility A.5 Personnel Training and Qualification	N	Note 3 – The current program has specific details concerning Quality Assurance Indoctrination training whereas the proposed program is more general in stating that FPL "establishes and maintains formal indoctrination and training programs for personnel performing, verifying or managing activities within the scope of the QAP to assure that suitable proficiency is achieved and maintained."	
		R - #2	The proposed program allows for a 90-day grace period for annual	FPL takes exception to Sections 4.1 and 6.3 of Supplement 2S-3 concerning a grace period for the

			evaluations for lead auditor proficiency.	documented annual evaluation of lead auditors. This meets Criterion XVIII of 10 CFR 50, Appendix B insofar as audits are performed by appropriately trained personnel. Also, reference NRC letter from G.S. Vissing to R.C. Mecredy, RG&E, dated July 22, 1998. The additional requirement of the SER that "in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days" is covered by the FPL QATR.
		N	Note 3 – The current program requires the development of "a training plan which assures that personnel performing activities affecting quality are trained in applicable Quality Instructions and other procedures and in the principles and techniques of the activities being performed." The proposed program does not include the specific training plan words, but details of training are also contained in NQA-1 Supplement 2S-4.	
2.2.6 Management Participation	Appendix A On-Site Review Group	N	Note 3 – The details that are contained in the current program concerning the CNRB are no longer relevant. The CNRB has been replaced. See other portions of this gap analysis for specific details.	
		N	Note 3 –	

			Details of programs of contractor organizations contained in the current program such as "The programs of contractor organizations that perform activities affecting quality shall be reviewed by Quality Assurance to assure that their management regularly reviews the status and adequacy of that part of the FPL Quality Assurance Program which they are executing" are not specifically stated in the proposed program but are covered under NQA-1 requirements.	
2.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 3 – Some details on what each direct report of the Chief Nuclear Officer and Department Heads are responsible for are not contained in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
3.0 Design Control	B.2 Design Control		None – Title only	
3.1 GENERAL REQUIREMENTS	B.2 Design Control B.3 Design Verification		None – Words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1.	
3.2 IMPLEMENTATION	Introduction	N	Note 3 –	

	B.2 Design Control		The details on Safety Related and quality related items that are contained in the current program are not in the proposed program.	
		N	Note 3 – The details on the control of the design organization including areas such as the approving of the QAP prior to release of design input are covered under supplier evaluation of the proposed program.	
		N	Note 3 - The current program states that "A standard PC/M and numbering system shall be established and used at each plant to ensure that all PC/Ms are handled in a uniform manner..." These words are not contained in the proposed program.	
3.2.1 Design Process	B.2 Design Control	R - #3	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, The current program states that "The design organization shall establish procedures to review industry design experience. As appropriate, this experience shall be made available to cognizant design personnel". These specific words are not in the	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			proposed program. However, the program does cover operating experience.	
3.2.2 Design Change Control	B.2 Design Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, Note 3 – The current program states that "design changes shall be reviewed to ensure that implementation of the design change is coordinated with any necessary changes to operating procedures and practices, and required Nuclear Assurance activities, such as inspections and surveillances". These specific words are not in the proposed program.	
3.2.3 Design Interface Control	B.2 Design Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. However, Note 3 – The specific words in the current program regarding interdisciplinary design "approval documentation of each involved discipline of the design organization shall appear on the design output document or on a separate document directly traceable to the design output. The	

			design organization shall designate a discipline(s) responsible for resolution of the comments..." are not in the proposed program.	
3.2.4 Design Verification	B.3 Design Verification	N	Most of the current program words are in program or NQA-1 Basic Requirement 3 and Supplement 3S-1. Note 3 – Referring to the supervisor performing design verification, the specific words "unless the specified design inputs have already been independently verified" are not in the proposed program.	
		N	Note 3 - The specific words in the current program of "Where reverification is not required for a design change, the bases shall be documented by the design organization" are not in the proposed program.	
		I - #4	In regards to design verification performed by the designer's immediate supervisor, the proposed program includes that the need shall be approved in advance by the supervisor's management and specifies an independent assessment to guard against abuse.	
3.2.5 Computer Programs/Software	B.17 Computer Software Control	I - #5	The proposed program commits to the requirements	

			of NQA-1 Supplement 11S-2 and Subpart 2.7 for computer program testing. Note: FPL commits to Regulatory Issue Summary (RIS) 2000-18 titled "Guidance on Managing Quality Assurance Records in Electronic Media" in instances when FPL chooses electronic media storage as a means of maintaining required records (see Section A.7.3). Section B.17 contains provisions for verifying and validating software including software that would be used with electronic records.	
		N	Note 3 – The specific detail contained in the current program regarding maintaining "instructions or procedures to effect the following..." are not in the proposed program.	
3.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.2.1 Site Vice President (SVP) Appendix A On-Site Review Group A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
4.0 Procurement Document Control	B.4 Procurement Control		None – Title only	
4.1 GENERAL REQUIREMENTS	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 4 and Supplement 4S-1. Note 3 – The specific words "These procedures and instructions shall delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of procurement documents" are not contained in the proposed program.	
4.2 IMPLEMENTATION			None – Heading only	
4.2.1 Procurement Document Provisions	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 4 and Supplement 4S-1. However, Note 3 – The current program details "Consideration shall be given to the need for special requirements in the preparation and review of procurement documents..." and "Special handling, preservation, storage, cleaning, packaging, and	

			shipping requirements shall be specified as appropriate, in the design documents or purchase orders..." are not specifically noted in the proposed program.	
4.2.2 Procurement Document Review	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirement 4 and Supplement 4S-1. Note 3 - The current program states "This review shall be documented and performed by designated personnel who have been trained and qualified in quality assurance practices and concepts." These specific words are not in the proposed program.	
4.2.3 Selection of Procurement Sources	B.4 Procurement Control	N	Most of the current program words are in program or NQA-1 Basic Requirements 4 and 7 and Supplements 4S-1 and 7S-1. However, Note 3 – The current program states "Verbal purchase orders shall be made in accordance with TQAR Appendix C exceptions to ANSI N45.2.13." The proposed program does not address verbal purchase orders.	
		R - #4	The current program requires an annual evaluation of suppliers. The	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			proposed program states "FPL will review the information described therein as it becomes available through its ongoing receipt inspection, operating experience, and supplier evaluation programs, in lieu of an annual basis."	
		R - #5	The proposed program allows for a 90-day grace period for the requirement to audit suppliers on a triennial basis.	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. Also, reference NRC letter from G. S. Vissing to R. C. Mecredy, RG&E, dated July 22, 1998. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in Section B.4 of the QATR "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-years plus 90 days."
		R - #6	The proposed program allows for the acceptance of	FPL may accept of a supplier of commercial grade calibration services

			accreditation in lieu of performing an audit when purchasing commercial grade calibration services from a supplier that has been accredited.	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 NRC letter from D. S. Collins to G. R. Overbeck, APS. Additionally, the SER states that: "When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body ... accreditation may be accepted in lieu of the Purchaser imposing a QA Program consistent with ANSI N45.2-1971, provided all the following are met: 1. The accreditation is to ANSI/ISO/IEC 17025. 2. The accrediting body is either NVLAP or an accrediting body recognized by NVLAP through an MRA. 3. The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. 4. The purchase documents impose additional technical and administrative requirements, as necessary, to satisfy APS QA Program and technical requirements. 5. The purchase documents require reporting as-found calibration data when calibrated items are found to

				be out-of-tolerance." The conditions stated above are met by FPL through Section B.4 of the QATR and lower tier procurement documents.
4.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
5.0 Instructions, Procedures & Drawings			None – Title only	
5.1 GENERAL REQUIREMENTS	A.1 Methodology		None	
5.2 IMPLEMENTATION			None – Title only	
5.2.1 Quality Assurance Program Documents	Introduction	R - #1 (same as earlier)	The current program states "The Quality Assurance Department reviews and comments on Quality Instructions written by other departments. Comments concerning compliance with corporate Quality Assurance commitments and regulatory requirements are resolved prior to issuance. The Quality Assurance Department receives controlled copies of Quality Instructions issued by other departments." These words are not located in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
5.2.2 Procedures and Instructions	Introduction B.14 Document Control Appendix B Procedures	R - #7	The current program states "Also included are maintenance and repair procedures for subcontracted maintenance and repair activities which are outside the normal scope of plant craft capability." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #8	The current program details how Quality Assurance or	1. See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			Quality Control shall review significant changes to operating procedures. This level of detail is not included in the proposed program.	2. (Sections C.1 and C.3) FPL does not commit to perform an independent review for each generating site each year. Instead, either a Quality Assurance expert panel decides which topics (from Table 1) receive independent assessment at what frequency or the topics in Table 1 are audited as a minimum of biennially. This meets Paragraphs 17.3.II.C.2.a, d and e insofar as assessments are planned and periodic, and scheduling is based on status and safety importance.
		R - #9	The current program states "Quality Assurance shall monitor condition report trend reports to determine the need to restore in-line review of procedures by Quality Assurance or Quality Control." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #10	The current program states "Contractor's site procedures and Quality Control inspection procedures shall be approved by the Plant General Manager, or designee, following reviews by Quality Assurance or Quality Control personnel to assure compliance with Corporate commitment and regulatory requirements." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		N	Note 3 –	

			The current program states "During the design, modification, and procurement phases, the Architect/Engineer or other contractors may be delegated responsibility for maintaining, issuing and verifying the implementation of appropriate program documents. In this case, Quality Assurance or Quality Control audit or surveillance activities shall assure that such measures are established and implemented." These words are not located in the proposed program.	
5.2.3 Drawings	B.14 Document Control	N	Note 3 – Specific details of drawing control are not in the proposed program.	
5.2.4 Acceptance Criteria	A.1 Methodology		None	
5.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
6.0 Document Control	B.14 Document Control		None – Title only	
6.1 GENERAL REQUIREMENTS	B.14 Document Control	I - #6	Most of the current program words are contained in the proposed program or NQA-1 Basic Requirement 6 and Supplement 6S-1. The proposed program includes the commitment "Provisions include establishing levels of use..."	
		I - #7	The proposed program includes the commitment "Each site maintains documentation that describes how implementing documents are maintained to assure that QAP requirements are met and are not inadvertently removed in later revisions."	
		I - #8	The proposed program includes the commitment "FPL also establishes programmatic procedure preparation, review and usage controls that ensure procedures are technically and administratively correct. These controls ensure that procedures are reviewed when pertinent source material is revised (such as when Technical Specifications are revised), when unusual incidents occur, when plant modifications are made, and	

			when significant deficiencies are identified "	
6.2 IMPLEMENTATION			None – Header only	
6.2.1 Quality Instructions	B.14 Document Control	N	Note 3 – The current program provides specific details on what Quality Instructions shall provide for. These details are not in the proposed program.	
6.2.2 Drawing Control	B. 14 Document Control	N	Note 3 – The current program states "FPL assumes control of the drawings and Master Drawing List after initial operation of the facility ...Nuclear Engineering shall require that participating design organizations update the drawings and Master Drawing List to reflect the as-built conditions of the facility prior to FPL's acceptance of these documents." These words are not in the proposed program.	
		N	Note 3 – Specific details on maintenance, distribution and control of the drawings contained in the current program are not in the proposed program.	
6.2.3 Design Documents Other Than Drawings	B. 14 Document Control	N	Note 3 –	

			Details on accessibility and use of design documents other than drawings contained in the current program are not in the proposed program.	
6.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
7.0 Control of Purchased Items & Services			None – Title only	
7.1 GENERAL REQUIREMENTS	B.5 Procurement Verification		None – Requirements are contained in the proposed program or NQA-1 Basic Requirement 7 and Supplement 7S-1.	
7.2 IMPLEMENTATION			None – Header only	
7.2.1 Evaluation of Suppliers	B.4 Procurement Control B.5 Procurement Verification	N	Note 3 – The words in the current program of "This evaluation is to ensure that the FPL contractors comply with the applicable portions of 10 CFR 50, Appendix B. Documented evidence of the evaluation, and the acceptance of the contractor's quality program and procedures shall be retained in the Quality Assurance Department files" are not located in the proposed program.	
7.2.2 Verification Activities	B.4 Procurement Control B.5 Procurement Verification	N	Note 3 – The words in the current program of "FPL verification activities ...shall be performed on those items where verification of procurement requirements cannot be determined upon receipt" could not be	

			located. These specific words are not in the proposed program.	
7.2.3 Receiving Inspection	A.5 Personnel Training and Qualification B.4 Procurement Control B.12 Inspection	N	Note 3 – The specific details on what receiving inspection includes in the current program are not in the proposed program.	
7.2.4 Supplier Furnished Records	B.4 Procurement Control		None – Requirements are contained in the proposed program or NQA-1 Basic Requirements 4 and 7 and Supplements 4S-1 and 7S-1.	
7.2.5 Release for Use or Installation	B.4 Procurement Control	R – #11	The current program states that "Documentary evidence that material and equipment conforms to the procurement requirements shall be available at the *plant site prior to installation* or use of such material or equipment" whereas the proposed program takes exception to this and states "documentary evidence that items conform to procurement requirements need not be available at the site prior to item installation, but will be available at the site prior to placing reliance on the item for its intended safety function."	This conforms to both Criterion VII of 10 CFR 50, Appendix B, and with Section 8.1 of Supplement 7S-1 of NQA-1-1994 insofar as both Criterion VII and Section 8.1 allow the item to be installed provided that the *documentary evidence is available at* the nuclear facility site prior to use of the item.
		N	Note 3 - Specific details on release for use or installation included in the current	

			program are not in the proposed program.	
7.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.e Vice President Integrated Supply Chain A.2.2.1 Site Vice President (SVP)	N	Note 4 - Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
8.0 Identification of Control of Material, Parts & Components	B.6 Identification and Control of Items		None – Title only	
8.1 GENERAL REQUIREMENTS	B.6 Identification and Control of Items		None – Requirements contained in the proposed program or NQA-1 Basic Requirement 8 and Supplement 8S-1.	
8.2 IMPLEMENTATION	A.3 Responsibility B.6 Identification and Control of Items	N	Note 3 – The current program states "This shall include welding material traceability to the point of consumption". These specific words are not in the proposed program.	
		N	Note 3 – The specific provisions concerning identification and control contained in the current program are not in the proposed program.	
8.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.e Vice President Integrated Supply Chain A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
9.0 Control of Special Processes	B.11 Special Process Control		None – Title only	
9.1 GENERAL REQUIREMENTS	B.11 Special Process Control		None	
9.2 IMPLEMENTATION	B.11 Special Process Control	N	Note 3 – The words in the current program "Special process requirements shall be included in design outputs and changes thereto" are not in the proposed program.	
9.2.1 Identification of Special Processes	B.11 Special Process Control	N	Note 3 – The details in the current program of "Others, (e.g., flushing, protective coating, plating applications and nuclear cleaning) should be reviewed to determine if they are special processes" are not in the proposed program.	
9.2.2 Procedure Qualification and Control	B.11 Special Process Control	N	Note 3 – The words in the current program of "Where FPL assigns work to outside contractors, the contractors shall make their procedures and personnel qualifications available for review to FPL prior to the start of work...The contractor shall also be responsible for the control and approval of sub-contractor procedures" are not specifically in the	

			proposed program.	
		N	Note 3 - The details on special process procedures in the current program (i.e., sufficiently detailed for a qualified person, etc.) are not in the proposed program.	
		R – #12	The words "Special process and procedures and revisions thereto which specify acceptance criteria...shall have the concurrence of the acceptance criteria by Nuclear Engineering prior to issuance and use" are not in the proposed program.	Section 3.2 of Supplement 9S-1 of NQA-1-1994 requires acceptance criteria for special processes to be specified or referenced in procedures or instructions. Section A.2.1.2.c of the proposed program assigns the responsibility to the Vice President Nuclear Engineering for nuclear plant engineering which includes the provision of acceptance criteria.
9.2.3 Personnel Qualification and Certification	B.11 Special Process Control	N	Note 3 – Details on "requirements for the period of certification, retesting, and recertification of personnel" are not in the proposed program.	
		N	Note 3 – Details on how contractors shall qualify personnel and maintain records are not in the proposed program.	
9.2.4 Control of Equipment	B.11 Special Process Control	N	Note 3 – The specific words in the current program "Equipment that must be of a specific type, range, or accuracy to provide conformance to specified requirements shall	

			be controlled to ensure that it is qualified, maintained, and calibrated in accordance with those requirements" is not in the proposed program.	
9.2.5 Special Process Records	B.11 Special Process Control	N	Note 3 – The specific words in the current program "Results of nondestructive examinations shall be documented and shall be evaluated for acceptance in accordance with applicable specifications, codes and standards by an individual who is certified in the applicable method" are not in the proposed program.	
		N	Note 3 – Details on record retention for contracted work in the current program, "Records shall also be maintained for verification activities when required by procedure, code or specification. For contracted work, these records shall be retained by the vendor or supplied to FPL, as required by contract or purchase order..." are not in the proposed program.	
9.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	D's	Basis for Reduction in Commitment Meeting Appendix B
10.0 Inspection	B.12 Inspection		None – Title only	
10.1 GENERAL REQUIREMENTS	B.12 Inspection	N	Most of the requirements contained in the proposed program or NQA-1 Basic Requirement 10 and Supplement 10S-1. Note 3 – The specific words "Examinations, measurements and tests of materials or products processed shall be performed for each work operation, where necessary, to assure conformance to established requirements" are not in the proposed program.	
10.2 IMPLEMENTATION			None – Header only	
10.2.1 Inspection Program	B.12 Inspection	N	Note 3 – Specific detail in the current program such as "For preoperational start-up and testing of plant modifications, Nuclear Division personnel may report functionally..." and "Transmission Operations personnel may perform inspections of equipment within their purview during operations..." are not in the proposed program.	

10.2.2 Inspection Plans and Schedules	B.12 Inspection	N	Note 3 – Specific details in the current program concerning planning such as "Documented inspection plans may be either a separate document or an integral part of work instruction documents..." and "The plans shall be based on design specifications, procurement documents..." are not in the proposed program.	
		N	Note 3 – The current program words "Inspection planning should include a review for the acceptability of sampling" are not in the proposed program.	
10.2.3 Inspection Personnel	B.12 Inspection	N	Most of the requirements contained in the proposed program or NQA-1 Basic Requirement 10 and Supplement 10S-1. Note 3 – The current program words "Prior to performing inspections, inspection personnel shall have access to the drawings, procedures, specifications, or other documented criteria necessary for performance of the inspection" are not in the proposed program.	
10.2.4 Inspection Procedures	B.12 Inspection		Much of the detail contained	

		N	in the proposed program or NQA-1 Basic Requirement 10 and Supplement 10S-1. Note 3 – Details in the current program concerning inspection procedures "Inspection procedures, instructions or checklists shall contain the following:..." are not in the proposed program.	
		R – #13	The words in the current program "Inspection procedures shall be reviewed by Nuclear Assurance personnel or for NDE by Engineering personnel to determine the need for an independent inspection and the degree and method if such an inspection is required, and to assure the identification of inspection personnel and the method of documentation of inspection results" are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
10.2.5 Inspection, Witness, and Hold Point Identification	B.12 Inspection	N	Note 3 – The words in the current program "These process procedures are subject to the review of the Quality Control organization for adequacy of inspection, witness, and hold points" are not in the proposed program.	
		R – #14	The words in the current	See the above discussion regarding

			program "FPL procurement documents shall indicate FPL witness or hold points applicable prior to during, or after the manufacture of an item or the performance of a service. A distinction shall be made between witness points and mandatory hold points" are not in the proposed program. (Note: The proposed program does not distinguish between hold and witness points).	10 CFR 50.54(a)(3)(ii).
10.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
11.0 Test Control	B.8 Test Control		None – Title only	
11.1 GENERAL REQUIREMENTS	B.8 Test Control		None	
11.2 IMPLEMENTATION			None – Header only	
11.2.1 Test Program	A.3 Responsibility B.8 Test Control	N	Much of the detail contained in the proposed program or NQA-1 Basic Requirement 11 and Supplement 11S-1. Note 3 – The specific words in the current program "Retest following repairs, replacements, or modification shall be performed in accordance with the original design and test requirements or acceptable alternatives. Retest shall be performed when the original test results are invalidated. A schedule shall be provided and maintained to provide assurance that all tests are performed and properly evaluated on a timely basis" are not in the proposed program.	
11.2.2 Test Procedure Preparation and Test Performance	B.8 Test Control	N	Note 3 – Details contained in the current program, such as "Testing shall be accomplished in accordance	

			with written approved test procedures which incorporate or reference the requirements and acceptance limits in the applicable design and procurement documents" are not in the proposed program.	
		N	Note 3 – The specific words in the current program "Test procedures shall be revised as necessary to assure that tests are performed in accordance with the latest approved information" are not in the proposed program. However, document control requirements require activities be performed to the latest revision.	
		R - #15	The current program includes "Specific measuring and test equipment utilized for testing; and As found and as left condition (as applicable)" as items that test records shall identify. These are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
11.2.3 Evaluation of Test Results	A.3 Responsibility B.8 Test Control		The detail is contained in the proposed program or NQA-1 Basic Requirement 11 and Supplement 11S-1.	
11.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located	

			in lower tier documents of the proposed program.	
		N	Note 4 – The Director Transmission Operation is listed in the current program. This position is not listed in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
12.0 Control of Measuring & Test Equipment	B.9 Measuring and Test Equipment Control		None – Title only	
12.1 GENERAL REQUIREMENTS	B.9 Measuring and Test Equipment Control	N	Much of the detail contained in the proposed program or NQA-1 Basic Requirement 12 and Supplement 12S-1. Note 3 – The words "It is the responsibility of each department maintaining calibrated instruments to provide for the calibration and control of such instruments" are not in the proposed program.	
12.2 IMPLEMENTATION			None – Header only	
12.2.1 Calibration and Control of Measuring and Test Equipment	B.3 Responsibility B.9 Measuring and Test Equipment Control	N	IEEE 498 paragraph 5.2 specifies environmental controls. Note 3 – The specific level of detail in the current program as to what M&TE control procedures or calibration program documents shall contain "M&TE control procedures or calibration program documents shall contain the following..." are not in the proposed program.	
12.2.2 Calibration Procedure	B.9 Measuring and Test Equipment	N	Note 3 –	

	Control		The specific level of detail in the current program as to what M&TE control procedures or calibration program documents shall contain "Calibration procedures shall contain, or reference as a minimum..." are not in the proposed program.	
12.2.3 Calibration Standards	B.9 Measuring and Test Equipment Control	N	Most of the detail contained in the proposed program or NQA-1 Basic Requirement 12 and Supplement 12S-1. Note 3 – The words in the current program "The accuracies of M&TE and reference standards shall be chosen such that the equipment being calibrated can be calibrated and maintained within the required tolerances" are not in the proposed program.	
12.2.4 "Out of Tolerance" Control and Corrective Action	B.9 Measuring and Test Equipment Control		None	
12.3 RESPONSIBILITIES	A.2 Organization	N	Note 4 – The Director Transmission Operation is listed in the current program. This position is not listed in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
13.0 Handling, Storage & Shipping	B.7 Handling, Storage and Shipping		None – Title only	
13.1 GENERAL REQUIREMENTS	B.7 Handling, Storage and Shipping		None – Requirements contained in the proposed program or NQA-1 Basic Requirement 13, Supplement 13S-1 or NQA-1 Subpart 2.2.	
13.2 IMPLEMENTATION			None – Header only	
13.2.1 General	A.3 Responsibility	N	Note 3 – The current program words "Instructions or procedures shall be written to define the requirements...and shall require implementation of the established design and specification requirements by personnel having appropriate qualifications" are not in the proposed program.	
13.2.2 Handling, Storage, and Shipping Procedures	B.7 Handling, Storage and Shipping	N	Most of the requirements contained in the proposed program or NQA-1 Basic Requirement 13, Supplement 13S-1 or NQA-1 Subpart 2.2. Note 3 – The words "by environmental conditions" included in the current program when describing	

			damage, loss, or deterioration are not in the proposed program.	
13.2.3 Cleanness Procedures	B.7 Handling, Storage and Shipping		None	
13.2.4 Housekeeping Procedures	B.7 Handling, Storage and Shipping		None	
13.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.e Vice President Integrated Supply Chain A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δ's	Basis for Reduction in Commitment Meeting Appendix B
14.0 Inspection, Test & Operating Status	B.10 Inspection, Test and Operating Status		None – Title only	
14.0 GENERAL REQUIREMENTS (NOTE: Number is incorrect)	B.10 Inspection, Test and Operating Status		None	
14.2 IMPLEMENTATION			None – Header only	
14.2.1 General	B.10 Inspection, Test and Operating Status	N	Note 3 – The detailed words in the current program "The Architect/Engineer or Contractors shall develop and implement procedures to comply with contractual responsibilities, and applicable codes, standards, specifications, and criteria...Elements of this system require that suppliers and contractors have a controlled manufacturing and test operation" are not in the proposed program.	
		N	Note 3 – The specific words in the current program referring to a controlled manufacturing and test operation "Methods to verify adequacy of the controls shall be established and implemented, as appropriate" are not located in the proposed program.	
14.2.2 Status Identification and	B.10 Inspection, Test and Operating		Most of the requirements	

Control	Status			
		N	contained in the proposed program or NQA-1 Basic Requirement 14. Note 3 – Some details regarding control of the application and removal of marking in the current program "and to prevent omission of inspections, tests, or other critical operations" are not in the proposed program.	
		R – #16	The words in the current program "These procedures shall require independent verifications, where appropriate to ensure that necessary measures have been implemented" are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
14.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	Δs	Basis for Reduction in Commitment Meeting Appendix B
15.0 Nonconforming Materials, Parts or Components	B.13 Corrective Action		None – Title only	
15.1 GENERAL REQUIREMENTS	B.13 Corrective Action		Requirements contained in NQA-1 Basic Requirement 15 and Supplement 15S-1.	
15.2 IMPLEMENTATION			None – Header only	
15.2.1 Program	A.3 Responsibility A.6 Corrective Action B.13 Corrective Action		Requirements contained in NQA-1 Basic Requirement 15 and Supplement 15S-1.	
15.2.2 Documenting and Controlling Nonconformances	A.6 Corrective Action B.13 Corrective Action	N	Note 3 – The specific words in the current program "The control of, and the documentation generated by the identification, disposition, correction, and verification of nonconformances may be transferred between processing methods..." are not in the proposed program. Note: This is removing a permissive.	
		N	Note 3 – The details contained in the current program on what measures to document and control nonconformances shall include are not in the proposed program.	
15.2.3 Documentation	A.6 Corrective Action B.13 Corrective Action	N	Note 3 –	

			The specific words in the current program "Documentation of the nonconforming item shall: identify the item; describe the nonconformance..." are not in the proposed program.	
15.2.4 Evaluation and Disposition	A.6 Corrective Action B.13 Corrective Action	N	Most of the requirements contained in NQA-1 Basic Requirement 15 and Supplement 15S-1. Note 3 – The specific details of the evaluation and disposition of nonconformances in the current program are not in the proposed program.	
15.3 RESPONSIBILITIES	A.2.1.2.c Vice President Nuclear Engineering A.2.1.2.f Director Nuclear Assurance A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
16.0 Corrective Action	A.6 Corrective Action B.13 Corrective Action		None – Title only	
16.1 GENERAL REQUIREMENTS	A.6 Corrective Action	I - #9	Most of the requirements are contained in the proposed program and NQA-1 Basic Requirement 16. The proposed program requires "Provisions are also made to ensure that corrective actions for *significant conditions* adverse to quality are completed as intended and are not inadvertently nullified by subsequent actions."	
16.2 IMPLEMENTATION			None – Header only	
16.2.1 Corrective Action and Follow-Up	A.6 Corrective Action	N	Most of the requirements are contained in the proposed program and NQA-1 Basic Requirement 16. Note 3 - The specific details in the current program concerning actions to take when an adverse condition is detected are not in the proposed program.	
		N	Note 3 – Details in this section such	

			as "Interdepartmental corrective action shall be requested by use of written correspondence. Audit reports, condition reports, nonconformance reports, interoffice letters, and other documents may be used for this purpose" are not in the proposed program.	
		N	Note 3 - The words "Where corrective action is required of contractor personnel, FPL shall define in procedures and contracts the corrective action interface..." are not in the proposed program. Note: This is a normal item to be included in contracts.	
16.2.2 Recurrence Control	A.6 Corrective Action		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 16.	
16.2.3 Incidents and Reportable Events Reporting	A.6 Corrective Action	N	Note 3 – Specific details in this section concerning operating reportable events and reports of incidents are not in the proposed program.	
16.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

		N	Note 3 and 4 – The details on responsibility in the current program for commitment tracking "The Vice Presidents, PSL, PTN, and Nuclear Operations Support are responsible for administering a commitment tracking system" are not in the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	P/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
17.0 Quality Assurance Records	B.15 Records		None – Title only	
17.1 GENERAL REQUIREMENTS	B.15 Records	N	Note 3 – The "such as" list of records included in the current program "The records shall include, as appropriate, data such as qualifications of personnel..." are not in the proposed program.	
		N	Note 3 – Specific details in the current program on how FPL will implement record control (i.e., FPL will implement Write Once Read Many (WORM) optical media...) are not in the proposed program.	
17.2 IMPLEMENTATION			None – Header only	
17.2.1 *Records Identification and* Classification	*B.15 Records*		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 17 and Supplement 17S-1.	
17.2.2 Completeness and Control	B.15 Records		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 17 and	

			Supplement 17S-1. Note: Many of the requirements are covered in Sections 2.2 and 2.6 of 17S-1.	
17.2.3 Retrieval	B.15 Records		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 17 and Supplement 17S-1.	
17.2.4 Storage	B.15 Records	I – #10	The QARSET concept for evaluation of records described in the current program is not included in the proposed program.	
17.3 RESPONSIBILITIES	A.2.2.1 Site Vice President (SVP)	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program. Specifically, the current program identifies a Records Official, the Corporate Records Supervisor, and The Quality Assurance Record Storage Evaluation Team. The proposed program does not define these titles.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
18.0 Audits			None – Title only	
18.1 GENERAL REQUIREMENTS	C. ASSESSMENT		None – The requirements are contained in the proposed program and NQA-1 Basic Requirement 18.	
		I - #11	The proposed program commits to "periodically performs independent reviews of matters involving the safe operation of its fleet of nuclear power plants, with a minimum of one such review being conducted for each generating site each year..."	
18.2 IMPLEMENTATION	C. ASSESSMENT		None – The requirements are contained in the program and NQA-1 Basic Requirement 18.	
18.2.1 Personnel	C. ASSESSMENT		None – The requirements are contained in the program and NQA-1 Basic Requirement 18.	
18.2.2 Planning and Scheduling	C. ASSESSMENT	R - #17	The current program states "Audits of selected aspects of operational phase activities are performed with a frequency commensurate with safety significance and performance. As a	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			minimum...these audits shall are performed at a biennial (2-year) frequency." The proposed program is performance based as detailed in Table 1.	
	C. ASSESSMENT	I - #12	The proposed program details the performance of self-assessments "performed by or for the group responsible for the activity being assessed."	
18.2.3 Conduct of Audits	C. ASSESSMENT	I - #13	The proposed program requires "independent assessments include examination of selected procedures to verify that the procedure review and revision controls...are effectively implemented."	
18.2.4 Reporting of Audit Findings	C. ASSESSMENT	R - #18	The current program requirement to transmit audit reports within 30 calendar days is not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
18.2.5 Follow-up	C. ASSESSMENT	R - #19	The requirement to provide a written response within 30 calendar days in the current program is not in the proposed program.	1. See the above discussion regarding 10 CFR 50.54(a)(3)(ii). 2. Section 6 of Supplement 18S-1 of NQA-1-1994 requires the audited organization to schedule corrective action and for the auditing organization to evaluate the audit responses. 3. This meets Criterion XVIII of 10 CFR 50, Appendix B, insofar as follow-up actions are taken where indicated.
18.2.6 Reports to Management	C. ASSESSMENT	R – #20	The requirement in the current program to periodically report on the	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			status of the Quality Program to members of the CNRB is not in the proposed program.	
18.3 RESPONSIBILITIES	A.2.1.2.f Director Nuclear Assurance	N	Note 4 – Responsibilities listed in the current program are located in lower tier documents of the proposed program.	

Current QAPD Section (paragraph)	QATR Section (paragraph)	R/N/I (Note 1)	A's	Basis for Reduction in Commitment Meeting Appendix B
Chapter 12 CONDUCT OF OPERATIONS			None – Title only	
12.1 Organization and Responsibility			None – Historical information that applies to positions and personnel at the time of initial plant startup and operation.	
12.2 Training			None – Historical information that applies to the training program at the time of initial plant startup and operation.	
12.3 Procedures			None – Information that describes the location of procedures and the emergency plan.	
12.4 Records			None – Information that describes the procedure for maintaining records.	
12.5 Administrative Control			None – Information that describes the procedure for maintaining administrative procedures.	
12.6 Plant Security Plan			None – Information that states that the Plant Security Plan is located elsewhere.	

12.7 Review and Audit			None – Title only	
12.7.1 Plant Nuclear Safety Committee (PNSC)	APPENDIX A – Plant Operating Review Committee	R – #20 (same as earlier)	The current program details the responsibilities of the Plant Nuclear Safety Committee (PNSC) and the Company Nuclear Review Board (CNRB). The proposed program eliminates the CNRB and combines functions of the groups into the Onsite Review Group.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #21	Many of the details contained in Section 12.7 through 12.10 of the current program are not in the proposed program. Appendix A of the proposed program is generic in nature "The ORG meets commensurate with the scope of activities, but minimal frequency requirements are specified in procedures." The current program is more specific in many details. Examples of these include meeting frequencies "The PNSC shall meet at least once per calendar month" whereas the proposed program is more generic in nature "The ORG meets commensurate with the scope of activities, but minimal frequency requirements are specified in procedures" and quorum discussions "The quorum of the PNSC necessary...shall consist of the Chairman and	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

			four members including alternates" versus the proposed program that states "Rules for a quorum are established and adhered to" and "The CNRB shall meet at least once per 6 months" versus "The ORG meets commensurate with the scope of activities..."	
		R – #22	The current program states that PNSC members "shall meet the requirements as described in Sections 4.2, 4.3, or 4.4, of the ANSI N-18.1-1971". The proposed program states that personnel shall be "qualified in accordance with implementing procedures that meet site Technical Specifications".	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R – #23	The current program includes "Review of Fire Protection Program and implementing procedures" and "Review of the Diesel Fuel Oil Testing Program and implementing procedures" under the responsibilities of the PNSC. This is not specifically included under the ORG in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #24	The current program states that the PNSC shall "Provide written notification within 24 hours to the Plant General Manager..." The proposed program does not specify within 24 hours "Provides written notification to level(s)..."	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).

		R - #25	The current program states "no more than two alternates shall participate as members in PNSC activities at any one time." This restriction is not specifically detailed in the proposed program "Alternate chairmen and members may be appointed...to serve on a permanent or temporary basis."	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		I - #14	The proposed program states "Should a voting member at a particular meeting have direct responsibility for item under review where a conflict of such considerations is likely, that member shall be replaced...by another voting member not having such potential conflict." The current program does not require a voting member to excuse themselves in this situation.	
12.7.2 Company Nuclear Review Board (CNRB)	APPENDIX A – Plant Operating Review Committee	N	Note 3 – The current program details the responsibilities of the Plant Nuclear Safety Committee (PNSC) and the Company Nuclear Review Board. The proposed program combines these into the Onsite Review Group. (See R #20 for more details on this area.)	
		I - #15	The proposed program includes "nondestructive	

			testing" and "administrative controls" as areas that the ORG has experience and competence to review. These are not specified in the current program.	
		I – #16	The proposed program includes 10CFR72.48 evaluations to be reviewed.	
		R – #20 (same as earlier)	The current program states that "Audits of unit activities shall be performed under the cognizance of the CNRB. These audits shall encompass..." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		I - #17	In regards to what is reviewed by the ORG, the proposed program states that "Any other matter related to nuclear safety requested by the Site Vice President, Site Director or plant manager, selected by ORG members, or referred to ORG by other organizations..." The current program only allows for "any other area of unit operation considered appropriate by the CNRB or the Chief Nuclear Officer."	
12.7.3 Technical Review and Control	B.14 Document Control	N	Note 3 – The details contained in the current program on procedures and procedure reviews, such as "Procedures and programs required by Technical Specification...shall be	

			approved by the Plant General Manager" are not in the proposed program.	
		R – #22 (same as earlier)	The current program states "Individuals responsible for reviews performed ...meet or exceed the minimum qualifications of ANSI N18.1-1971. These words are not in the proposed program.	1. See the above discussion regarding 10 CFR 50.54(a)(3)(ii). 2. See Sections A.5 and A.7.3 of the proposed program for further details.
12.8 Procedures and Programs	B.14 Document Control Appendix B Procedures	R - #26	Much of the information is contained in the program and NQA-1 Basic Requirement 6 and Supplement 6S-1. However, The current program states that "Each procedure listed in Technical Specification 6.8.1...shall be reviewed and approved prior to implementation and reviewed periodically as set forth..." These words are not in the proposed program.	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
		R - #27	The current program requires for temporary changes that "The change is documented ...within 14 days of implementation." The proposed program requires that "Temporary changes are documented and, if appropriate, incorporated in the next revision of the procedure."	See the above discussion regarding 10 CFR 50.54(a)(3)(ii).
12.9 Record Retention	B.15 Records	N	Note 3 – The details contained in the current program as to the	

			specific types of records and the length of time for which they shall be retained are not in the proposed program. However, NQA-1 Non-mandatory Appendix 17A-1 directly covers the majority of these. A note on snubber records was added to the proposed program to cover a record not addressed in NQA-1.	
12.10 Process Control Program (PCP)	Appendix A On-Site Review Group	N	Note 3 – Details contained in the current program on the Process Control Program (PCP) are not in the proposed program. Note: The words in the proposed program state that the ORG reviews the program.	

Legend:

Note 1 - "I" – Increase in commitment
"N" – Not a Reduction in commitment
"R" – Reduction in commitment

Note 2 – Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to the Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.

Note 3 - Methodology details (the "how") in the current program description are not included in the proposed QATR. The intent of the QATR is to establish appropriate/sufficient requirements (the "what") to provide a quality assurance program meeting 10CFR50, Appendix B, but to allow flexibility in how the requirements are met. Therefore, this change in methodology detail (the "how") is not considered to be a reduction in commitment.

Note 4 - The QATR does not assign responsibilities beyond those listed in Section A.2 and A.3. The responsibilities listed in the current QATR are documented in lower tier documents.

ENCLOSURE 3

FLORIDA POWER AND LIGHT COMPANY,
FPL ENERGY DUANE ARNOLD, LLC
AND FPL ENERGY SEABROOK, LLC

ST. LUCIE UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251
SEABROOK STATION
DOCKET NO. 50-443
DUANE ARNOLD ENERGY CENTER
DOCKET NO. 50-331

FEBRUARY 15, 2006

LIST OF QATR EXCEPTIONS/ALTERNATIVES
TO NMC-1

8 PAGES FOLLOW

ENCLOSURE 3
QATR Exceptions/Alternatives

QATR Exception	Source/Basis for Acceptance
Policy Statement and Approval Page The policy statement is approved by the Senior Vice President Nuclear Division & Chief Nuclear Officer, FPL vs. the President & Chief Nuclear Officer, NMC and the topical report is approved by the Director Nuclear Assurance vs. both the NMC President and CEO, NMC and the Director, Nuclear Oversight.	This is justified based on Paragraph 17.3.II.A.1 of NUREG-0800 that requires the policy statement to be approved by upper management and on Paragraph 17.3.II.A.2.e(3) that requires the responsibility for the QA program to be established. These also meet Criteria I, II and VI of 10 CFR 50, Appendix B insofar as an appropriate quality assurance program is established and the documents are approved by authorized personnel.
Policy Statement, Introduction and definition of "Quality Related" in Appendix C **Quality Related:** This classification is applied to selected equipment, components, structures and services designed to support and/or protect the safety function of safety related equipment. Quality assurance program elements are applied with a graded approach to quality to an extent that is commensurate with the important to safety. Implementing documents establish program element applicability. These include those items or related services that are not safety related and are in one or more of the following categories: 1. Equipment, components and structures designed to meet seismic requirements or whose failure could: (a) damage safety related equipment such that the equipment would be prevented from performing its safety function, or (b) result in releases exceeding the exposure guidelines of the Offsite Dose Calculation Manual. 2. Fire protection equipment: (a) required to protect safety related equipment, or (b) whose failure could result in water damage to safety related equipment which could prevent the equipment from performing its safety function, or (c) required to maintain the integrity of a fire barrier necessary to protect safety related equipment. 3. A partial or total loss of function of a radioactive confinement system that could	An expanded explanation of the applicability of the FPL Quality Assurance Topical Report is provided that is consistent with industry practices.

result in an accidental, unplanned, or uncontrolled release of radioactivity exceeding the Offsite Dose Calculation Manual limits. 4. Equipment whose failure under normal operating conditions or an anticipated transient, results in: (a) exceeding a safety limit specified in the Technical Specifications, or (b) initiation of a FSAR Design Basis Accident, or (c) the reactor coolant system not being in a controlled or design condition while operating or shutdown. 5. Instrumentation, equipment, components, or structures required to be operable by the Technical Specifications. 6. Instrumentation that is essential to preventing or monitoring release of radioactive material to the environment which could exceed the guidelines of the Offsite Dose Calculation Manual.	
Sections A.1 and B.1 The QAP applies to activities affecting the performance of safety-related structures, systems and components, including, but not limited to, design; procurement; fabrication; installation; modification; maintenance; repair; refueling; operation; training, inspection; and tests.	While NMC-1 specifically excludes its direct application to decommissioning activities, the FPL Quality Assurance Topical Report does not. There are no plans to decommission any FPL nuclear power plants; nonetheless, the FPL Quality Assurance Topical Report could be used for such an activity. While this is a conservative approach, it meets 10 CFR 50.54(a)(1) 10 CFR 50.82(a)(4)(i) and 10 CFR 50.34(b)(6)(ii).
Sections A.2, A.3 and A.4 The caveat that some titles and reporting relationships may vary between corporate and some sites, but in all cases there is a designated position to carry out the defined responsibilities, is moved from the site organization in NMC-1 to the overall organization. In addition, the titles and responsibilities vary between FPL and NMC. However, the organizational structure, functional responsibilities, levels of authority, and interfaces as recommended in Paragraph 17.3.II.A.2.a are defined.	This meets Criterion I of 10 CFR 50, Appendix B insofar as the authority and duties of persons performing activities affecting the safety related functions of structures, systems and components are clearly established and delineated in writing.

Sections A.5 and A.7.3	
• For Supplement 2S-3: FPL may apply a 90-day grace period to the requirement for a documented annual evaluation of lead auditor proficiency. 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 one year plus 90 days.	a. FPL takes exception to Sections 4.1 and 6.3 of Supplement 2S-3 by providing a grace period for the documented annual evaluation of lead auditors. This meets Criterion XVIII of 10 CFR 50, Appendix B insofar as audits are performed by appropriately trained and qualified personnel. Reference the SER contained in NRC letter from G. S. Vissing to R. C. Mecredy, RG&E, dated July 22, 1998. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in Section B.4 of the QATR "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 one year plus 90 days." This exception is contained in Appendix C of the current FPL QATR.
• FPL takes exception to the Storage Areas section (6.2.4) of NQA-1 and commits to "the use or storage of food, drinks, and salt tablet dispensers in any storage area shall be controlled and be limited to designated areas here such use or storage is not deleterious to stored items".	b. Regarding Regulatory Guide 1.38, FPL takes exception to Section 6.2.4 of Subpart 2.2 of ASME NQA-1-1994. Section 6.2.4 prohibits the use or storage of food, drinks, and salt tablet dispensers in controlled storage areas. Instead, the use and storage of these items shall be controlled and limited to designated areas where such use or storage is not deleterious to stored items. This meets Criterion XIII of 10 CFR 50, Appendix B insofar as measures have been established to prevent damage or deterioration during storage of material and equipment.
• Regulatory Guide 1.97, Revision 3, May 1983, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident" – In lieu of the Regulatory Guides listed in Table 1 of NMC-1, NMC commits to the regulatory guidance and industry standards for quality assurance as described in NMC-1. Commitment to the technical provisions of	c. FPL does not take a position on Regulatory Guide 1.97 titled "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident" in this topical report. Each unit has specific licensing commitments regarding this guide. In addition, neither Paragraph 17.3.II.A.7.b nor Section 17.3.VI.A of NUREG-0800 recommends a position on the guide to be established in this topical report. Note that the definition of "Quality Related" in

Regulatory Guide 1.97 is NMC site-specific as addressed in each plant UFSAR or other licensing commitments.	Appendix C and the Introduction commit to issue instructions controlling safety related instrumentation, instrumentation required to be operable by the plants' Technical Specifications and instrumentation that is essential to preventing or monitoring release of radioactive material to the environment which could exceed the guidelines of the relevant Offsite Dose Calculation Manual.
• 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" (Position C.7) – FPL meets the intent of the quality assurance guidance cited in Position C.7. Compliance with the remainder of the [technical] positions of Regulatory Guide 1.143 is site specific, as addressed in each plant's UFSAR.	d. FPL meets the intent of the quality assurance guidance cited in Regulatory Position C.7 of Revision 2 of Regulatory Guide 1.143 titled "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants." In accordance with Regulatory Position D of Revision 2, there is no intent to backfit this guidance on current licensees. Radioactive waste management systems already exist at each site.
• Regulatory Guide 4.15, Revision 1, February 1979, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment" – FPL meets the intent of Regulatory Guide 4.15.	e. Sections 17.3.II.A.7.c and 17.3.VI.B.8 of NUREG-0800 recommend a position be taken in the Quality Assurance Topical Report on Regulatory Guide 4.15. FPL does not commit to Regulatory Guide 4.15 titled "Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment." The radiological monitoring programs, which have already been established at each of the FPL plants, meet the intent of this guide.
• Regulatory Guide 7.10, Revision 2, March 2005, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material" – FPL commits to implement the quality assurance guidance for activities related to the packaging and transport of radioactive material that are under its control. Quality Assurance for the design, fabrication and licensing of shipping containers is the responsibility of the container certificate holders. NMC-1 commits to Revision 1 of this Regulatory Guide.	f. FPL adopts the most recently approved version of this RG by committing to Revision 2 of Regulatory Guide 7.10 titled "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material."
• Generic Letter 85-06, April 1985, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety-Related" – NMC commits to the quality assurance guidance cited in the Generic Letter.	g. FPL does not take a position on Generic Letter 85-06 titled "Quality Assurance Guidance for ATWS Equipment That Is Not Safety-Related" in this topical report. Each unit has specific licensing commitments regarding Anticipated Transient Without Scram (ATWS) equipment. In addition, neither Paragraph 17.3.II.A.7.c nor Section 17.3.VI.B recommends a position on the letter to be established in this topical report. Note that the

	definition of "Quality Related" in Appendix C and the Introduction commit to issue instructions controlling equipment whose failure could: i) result in releases exceeding the exposure guidelines of the Offsite Dose Calculation Manual, or ii) under an anticipated transient, result in the reactor coolant system not being in a controlled or design condition while operating.
• Regulatory Issue Summary 2000-18, October 2000, "Guidance on Managing Quality Assurance Records in Electronic Media" – In instances when FPL chooses electronic media storage as a means of maintaining required records, FPL will comply with the guidance of this Regulatory Issue Summary.	h. FPL commits to Regulatory Issue Summary (RIS) 2000-18 titled "Guidance on Managing Quality Assurance Records in Electronic Media." The RIS states that NIRMA Technical Guide TG16-1998 titled "Software Configuration Management and Quality Assurance" provides an acceptable basis for complying with Appendix B to 10 CFR 50, 10 CFR 71 and 10 CFR 72. FPL already has an acceptable method for verifying and validating software. This existing method will be used for software associated with electronic records.
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 years plus 90 days. This is an alternate to Position C.3.2.1 of Regulatory Guide 1.28, Revision 3.	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. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in Section B.4 of the QATR "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 years plus 90 days."

• 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.	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. Additionally, the SER states that "When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body ... accreditation may be accepted in lieu of the Purchaser imposing a QA Program consistent with ANSI N45.2-1971, provided all the following are met: 1. The accreditation is to ANSI/ISO/IEC 17025. 2. The accrediting body is either NVLAP or an accrediting body recognized by NVLAP through an MRA. 3. The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. 4. The purchase documents impose additional technical and administrative requirements, as necessary, to satisfy APS QA Program and technical requirements. 5. The purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance. The conditions stated above are met by FPL through Section B.4 of the QATR and lower tier procurement documents.
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.

Sections C.1 and C.3 The independent assessment program provides comprehensive independent evaluations of activities and procedures. Activities having immediate effect on safety, such as Operations or Maintenance, are independently assessed on a routine basis. Other topics, as identified in Table 1, were performance metrics, corrective action history and effectiveness, process/personnel stability, self-assessments, and response to operating experience provide sufficient evidence of satisfactory performance, may receive less frequent independent assessment attention, while topics with recent process/personnel changes or unsatisfactory or declining performance trends receive more frequent assessments. A Quality Assurance expert panel documents the bases for its decisions regarding which topics (from Table 1) receive independent assessment at what frequency, such that activities covered by Table 1 are reviewed annually as candidates for independent assessment. In the event the expert panel review process is not used to determine frequencies, the topics in Table 1 are audited as a minimum of biennially. A 90-day grace period may be applied to this periodicity. 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 two years year plus 90 days. Certain activities, as identified in Table 2, receive independent assessments at frequencies established by related NRC rules. In addition, independent assessments include examination of selected procedures to verify that the procedure review and revision controls of Section B.14 are effectively implemented.	a. Either a Quality Assurance expert panel decides which topics (from Table 1) receive independent assessment at what frequency or the topics in Table 1 are audited as a minimum of biennially. This meets Paragraphs 17.3.II.C.2.a, d and e of NUREG-0800 insofar as assessments are planned and periodic, and scheduling is based on status and safety importance. b. FPL applies a 90-day grace period to the biennial audits of topics in Table 1. This meets Criterion XVIII of 10 CFR 50, Appendix B insofar as audits of the topics are still periodic. Reference the SER contained in NRC letter from G. S. Vissing to R. C. Mecredy, RG&E, dated July 22, 1998. Additionally, the SER states that "... RG&E modified QAPSO Section 17.1.7, "Regulatory Commitments," to establish a commitment that for activities deferred in accordance the 90-day "grace period," the next performance due date for such activities will be based on their originally scheduled date, i.e., in all cases, the periodicity for these activities will not be allowed to exceed the original RG commitment plus 90 days." FPL adheres to this additional commitment through the words in Section B.4 of the QATR "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 two years plus 90 days." This exception is contained in Appendix C of the current FPL QATR
Table 1	The presentation of the topics subject to performance-based independent assessment considerations differs

	from that in NMC-1. However, the topics are comprehensive.
Table 2 NMC-1 commits to annual assessments of emergency planning and of site security.	The NMC-1 commitment exceeds the requirements of 10 CFR 50 and of 10 CFR 73. Assessments of the emergency plan program elements and implementation of the security program may be extended up to two years based on performance data. This complies with 10 CFR 50.54(t) and 10 CFR 73.55(g)(4) insofar as the assessments may either be annual or be extended to biennial based on performance indicators and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness or security, as applicable, but no longer than 12 months after the change.
Appendix B	The types of procedures that are listed are the same as in NMC-1 other than the list has been rearranged alphabetically.
Appendix C NMC uses the definitions of terms as provided in Section 4 of the Introduction of NQA-1 1994 in interpreting the requirements of NQA-1 and of the other standards to which NMC-1 commits.	FPL uses the definitions of terms as provided in Section 4 of the Introduction of ASME NQA-1-1994. a. In Section A.7.1, FPL commits to compliance with 10 CFR 21. Note that 10 CFR 21.3 contains expanded definitions of "commercial grade items" and the applicability of these definitions as well as the dedication of these items than found in the Introduction of NQA-1. b. While FPL commits to the definition of "nonconformance" in NQA-1, this does preclude FPL from using regulatory guidance such as found in Regulatory Issue Summary 2005-20 titled "Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, 'Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability'."