

## New Plant QA Task Force Parking Lot Issues

<ul style="list-style-type: none"> <li>Consider adding Operating Organization Authorities and Responsibilities. (Does 14.4 cover ANS3.2? Does it need to be in QAPD?)</li> </ul>	<p>14.4 [should read 13.1]</p> <p>SRP-13.1 (in its current draft) addresses the Operating Organization authorities and responsibilities and requires the licensee to implement an organization consistent with Reg. Guide 1.33 (which drives back to ANSI N18.7-1976). This may cause some discontinuity between this section and Section 17.5, since these documents are not being listed as a commitment. If the information is to be retained in this section of the COL application, then there should be no reason to include this detail in the QAPD. However, we may want to discuss with the NRC the difference between the acceptance criteria of Section 13 and 17 regarding commitment to Reg. Guides and ANSI Standards.</p> <p><b>We need to talk to the NRC concerning the differences in Section 13 commitments to RG 1.33 and Section 17 no longer commits to it.</b></p>
<ul style="list-style-type: none"> <li>Conduct of Operations does 13.4 adequately cover?</li> </ul>	<p>SRP Section 13.4 in general has deferred to the QAPD for these criteria with the exception of the listing of programs that need to be implemented prior to start of operations. Some of the information that previously was addressed through the commitment to ANSI N18.7 (through Reg. Guide 1.33) is not specifically called out here nor in Section 17.5. I would recommend that we not include this information in the QAPD when there is no acceptance criteria in the SRP. This allows each utility more flexibility in developing their programs.</p> <p><b>We do not need to include all of the COO requirements in the template. (13.4 does not cover all of them but there is no reason to unless the NRC makes us.)</b></p>
<ul style="list-style-type: none"> <li>Discuss changes to QAPD during construction governed by 50.55 (f)? (Frequency of submittals, 50.54 (a))</li> </ul>	<p>1) The proposed rule changes will allow application of 50.54 (a) and 50.55 (f) to COL applicants and holders of combined licenses.</p> <ul style="list-style-type: none"> <li>a) 10CFR52.3 references QAPD submittal requirements for changes made pursuant to 50.54 (a)3 or 50.55 (f)(3)</li> <li>b) In the rulemaking discussion regarding 10CFR52.83 - it is stated that conforming changes are being made to make provisions of 10CFR50 applicable to applicants and holders of combined licenses</li> <li>c) Changes have been made to 50.54 and 50.55 address combined licenses</li> </ul> <p>2) In allowing application of these sections, changes to QAPD that <u>do not reduce commitments</u> as defined by 50.54 (a)3 or 50.55 (f)(3) need only be submitted to the NRC within 90 days from the change and do not require NRC approval prior to implementation.</p> <p><b>Confirm that 10 CFR 50.54 and 10 CFR 50.55 are applicable to COL.</b></p>

<ul style="list-style-type: none"> <li>Follow-up/discuss QA involvement/role with Design analysis (inline role). (50.34 (f)(3)(iii)(c &amp; h) NRC comment. Group agrees with procedure inline review.</li> </ul>	<p>Organizations currently doing design functions, I didn't see where the QA programs included a separate organization for the design verification from those performing the design. Since the NRC has been active in reviewing and approving certified designs, it would be good for us to find out how much they have enforced this requirement. Also, it would be good to find out what bounds the NRC would expect for this. Does it extend to manufacturers designing their standard components that are used in safety-related SSCs? Is it limited to the NSSS and principle A/Es? Would this be applicable to design changes and modifications during the operations phase (changes considered similar in nature to the design/construction phase)?</p> <p><b>What is the regulatory basis for applying 10 CFR 50.34(f)(3)(iii)(c&amp;h) requirements on COL plants?</b></p> <p>"This rule applies only to the pending applications by Duke Power Company (Perkins Nuclear Station Units 1, 2 and 3), Houston Lighting &amp; Power Company (Allens Creek Nuclear Generating Station, Unit 1), Portland General Electric Company (Pebble Springs Nuclear Plant, Units 1 and 2), Public Service Company of Oklahoma (Black Fox Station, Units 1 and 2), Puget Sound Power &amp; Light Company (Skagit/Hanford Nuclear Power Project, Units 1 and 2), and Offshore Power Systems (License to Manufacture Floating Nuclear Plants)."</p>
<ul style="list-style-type: none"> <li>Use/qualification of foreign calibration for NRC acceptance.</li> </ul>	<p><b>We would like to recognize the foreign calibration laboratory certifications. What is the NRC thoughts on this issue?</b></p>