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October 2, 2006

Comment on Draft Regulatory Guide DG-1145

Request for written clarification for DG-1145, Section C.III.1 - Information Needed for a COL Application Referencing a Certified Design, Section 17.5.3, "Evaluation of the QAPD Against the SRP and QAPD Submittal Guidance," dated September 2006, which states:

COL applicants may use an existing QAPD that is approved by the NRC for current use for either or both phases, provided that alternatives to or differences from the SRP in effect 6 months prior to the docket date of the application of a new facility are identified and justified.

Chapter 17 of the FSAR should also describe the extent to which the applicant will delegate the work of establishing and implementing the QA program or any part thereof to other contractors. The FSAR should clearly delineate those QA functions which are implemented within the applicant's QA organization and those which are delegated to other organizations. The FSAR should describe how the applicant will retain responsibility for and maintain control over those portions of the QA program delegated to other organizations. The FSAR should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented. The FSAR should identify major work interfaces for activities affecting quality and describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

Based on the way 17.5.3 is written, it appears that in addition to providing an existing NRC approved QAPD (and incorporating it into FSAR 17.5 by reference), a COL applicant must also provide a detailed description as outlined in the second paragraph, into FSAR 17.5.

During the NRC Public meeting held on Friday, September 22, 2006, regarding Draft Regulatory Guide (DG-1145), this same request for clarification was raised. NRC staff member, Paul Prescott, stated that referencing an existing NRC approved QAPD in the COLA applicants FSAR 17.5 would be sufficient without providing the additional description information outlined in the second paragraph of DG-1145, Section 17.5.3. **Written confirmation of this verbal clarification is requested.**

Based on the preceding, it is recommended that DG-1145, Section 17.5.3 also be revised to clarify this. Possible rewording to the second paragraph of Section 17.5.3 could be as follows: "For COL applicants that don't have an existing NRC approved QAPD, Chapter 17 of the FSAR should also describe..."

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