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Date: 11/1/2006 3:17:03 PM
Subject: QA Draft RAIs

Jim,

Attached are the draft RAIs that the staff plans to issue regarding your QA manual. Please take a look and let me know if you have any questions regarding the staff's request. Thanks.

Christian Araguas

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RAI 17.1-1SSAR NDQAM Part 2 Section 1 - Organization Section 17.1.1 of RS-002, paragraph 1.A., states that the organization description and charts of the lines, interrelationships, and areas of responsibility and authority for all organizations performing quality-related activities, including the applicant's organization and principal contractors, are provided. Section 1 of the NDQAM describes the organizations that will be responsible for the development of information that will support the ESP application. The plan explains the specific tasks that organizations and individuals will be performing that relate to ESP activities, and also states that "certain common elements, procedures, and organizations described in this NDQAM exist for currently operating SNC nuclear plants." However, the section does not clearly describe the interfacing between existing organizations that will perform QA activities in support of the ESP application who also perform QA activities under existing QA programs. Identify the organizations that will perform QA activities under the NDQAM, the existing operations QA program, or under both QA programs.

RAI 17.1-2SSAR NDQAM Part 2 Section 4 - Procurement Document Control Section 17.1.1 of RS-002, paragraph 4.B., states that provisions exist for review and approval of procurement documents for ESP activities that would affect SSCs important to safety. Section 4.2 of the NDQAM establishes a commitment to NQA-1-1994, Basic Requirement 4 and Supplement 4S-1, and includes clarifications and exceptions to these requirements. As an exception, SNC proposes that "the quality assurance review of procurement documents is satisfied through review of the applicable procurement specification, including the technical and quality procurement requirements, prior to bid or award of contract." This exception does not specify if procurement documents as well as changes to procurement documents will be part of the proposed quality assurance review. Clarify if the proposed quality assurance review of procurement documents is still performed.

RAI 17.1-3SSAR NDQAM Part 2 Section 6 - Document Control Section 17.1.1 of RS-002, paragraph 6., states that provisions exist to ensure that documents related to ESP activities that would affect SSCs important to safety, including changes, are reviewed for adequacy, approved for release by authorized personnel, and distributed and used at the location where the prescribed activity is performed. Section 6 of the NDQAM does not provide guidance for controlling the distribution of new and revised documents, including superceded documents, to preclude the possibility or use of inappropriate documents. Clarify how SNC plans to control the distribution of new and revised documents consistent with Section 17.1.1 of RS-002.