



December 14, 2006

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

ATTENTION: Document Control Desk

SUBJECT: **Calvert Cliffs Nuclear Power Plant**
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Nine Mile Point Nuclear Station
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Change to Common Quality Assurance Program (TAC Nos. MC9180, MC9181, MC9182, MC9183, and MC9184)

- REFERENCES:**
- (a) Letter from J.M. Heffley (CGG) to Document Control Desk (NRC), Request for Approval of a Common Quality Assurance Program for Constellation Generation Group, LLC, dated December 5, 2005
 - (b) Letter from J.M. Heffley (CGG) to Document Control Desk (NRC), Response to Request for Additional Information Regarding Common Quality Assurance Program (TAC Nos. MC9180, MC9181, MC9182, MC9183, and MC9184), dated September 1, 2006
 - (c) Telephone conference between P.D. Milano, et al (NRC) and B.S. Montgomery, et al (CGG) on December 14, 2006.

Reference (a) submitted a common Quality Assurance Topical Report (QATR), pursuant to Title 10 of the Code of Federal Regulations 50.54(a), for Calvert Cliffs Nuclear Power Plant, Units 1 and 2, Nine Mile Point Nuclear Station, Units 1 and 2, and R.E. Ginna Nuclear Power Plant. The program described in the QATR would be applied to licensed activities under 10 CFR Parts 50, 71, and 72.

Reference (b) requested additional information to assist the Nuclear Regulatory Commission in their review of Reference (a). Our response to that request included a revised version of the QATR.

In Reference (c), agreement to modify the exception to Non-Mandatory Appendix 2A-1 was reached as it applies to personnel performing inspections that are in the same organization as that which performed the work. That modification is to include a statement that the inspector, in addition to possessing the same

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level of qualification as that required for performing the task being verified, will be trained and certified to perform inspections in a manner consistent with a Level I quality inspector. Also, these inspectors will be authorized to accept or reject the work being inspected. The results of inspections by these individuals will be reviewed by a certified Level II or higher quality inspector.

Accordingly, the changes to QATR Section A.5 are included in Attachment 1 to this letter. Please replace this page in your copy of the QATR.

Should you have any questions regarding the information in this submittal, please contact me at (410) 897-5189 or Bruce.S.Montgomery@constellation.com.

Very truly yours,



Bruce S. Montgomery
Manager-Fleet Quality & Performance
Assessment

JMH/EMT

Attachment: (1) Revised QATR Page

cc: P. D. Milano, NRC
S. J. Collins, NRC
Resident Inspector, NRC (Ginna)
Resident Inspector, NRC (Calvert Cliffs)
Resident Inspector, NRC (NMPNS)

T. G. Colburn, NRC
R. I. McLean, Maryland DNR
J. P. Spath, NYSERD
P. Eddy, NYS Dept. of Public Services

ATTACHMENT (1)

Revised QATR Page

A.5 PERSONNEL TRAINING AND QUALIFICATION

Personnel assigned to implement elements of the QA program must be capable of performing their assigned tasks. To this end, CGG establishes and maintains formal indoctrination and training programs for personnel performing, verifying or managing activities within the scope of the QA program to assure that suitable proficiency is achieved and maintained. Generating site and support staff minimum qualification requirements are as delineated in each site's Technical Specifications. Other qualification requirements may be established but will not reduce those required by Technical 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 CGG procedures. Indoctrination includes the administrative and technical objectives, requirements of the applicable codes and standards, and the QA program elements to be employed. Training for positions identified in 10 CFR 50.120 is accomplished according to programs accredited by the National Nuclear Accrediting Board of the National Academy of Nuclear Training that implement a systematic approach to training. Records of personnel training and qualification are maintained.

In establishing qualification and training programs, CGG commits to compliance with NQA-1-1994 Basic Requirement 2 and Supplements 2S-1, 2S-2, 2S-3 and 2S-4, with the following alternatives and exceptions:

1. 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 the same as 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.
2. In lieu of being certified as Level I, II or III in accordance with Non-Mandatory Appendix 2A-1 of NQA-1-1994, personnel performing operations phase independent quality verification inspections, examinations, measurements, or tests or material products on activities, that are in the same organization as that which performed the work, will be required to possess the same minimum level of qualification as that required for performing the task being verified. The verification shall be within the skills of these personnel and/or is addressed by procedures. These individuals will also be trained and certified to perform inspections in a manner consistent with a Level I quality inspector. The inspectors will be authorized to accept or reject the work being inspected. The results of inspections by these individuals will be reviewed by a certified Level II or higher quality inspector. These individuals will not be responsible for the planning of quality verification inspections and tests (i.e. establishing hold points and acceptance criteria in procedures, or determining who will be responsible for performing the inspections), evaluating inspection training programs, or certifying inspection personnel.
3. In lieu of Supplement 2S-2, CGG will follow the applicable standard cited in the latest version(s) of Sections III and XI of the ASME Boiler and Pressure Vessel Code approved by the NRC for use at CGG sites for qualification of nondestructive examination personnel.
4. 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 audit process according to section C.2 of this QATR, and to effectively organize and report results, including participation in at least one nuclear audit within the year preceding the date of qualification.