

March 16, 2007

R. M. Krich, Senior Vice President
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SUBJECT: REPLACEMENT PAGES FOR THE FINAL SAFETY EVALUATION FOR
TOPICAL REPORT (TR) UN-TR-06-0001, "QUALITY ASSURANCE PROGRAM
DESCRIPTION" (PROJECT NO. 746)

Dear Mr. Krich:

By letter dated March 14, 2007 (ML070610261), the U.S. Nuclear Regulatory Commission (NRC) staff issued its final safety evaluation (SE) for UniStar Nuclear's Quality Assurance Program Description Topical Report (TR). Since issuance, the staff identified clarifications that are necessary. These clarifications do not affect the validity of the staff's March 14, 2007 SE. Please replace pages 10, 11, and 12 with the enclosed revised pages in the SE. Revisions are identified with right margin markings.

In accordance with the guidance provided on the NRC website, we request that UniStar Nuclear publish the accepted version of this TR within three months of receipt of the March 14, 2007 letter. The accepted version shall incorporate the March 14, 2007 SE with the enclosed replacement pages after the title page.

If you have any questions, please contact me at ljb3@nrc.gov or (301) 415-1311.

Sincerely,

/RA/

Larry J. Burkhart, Senior Project Manager
EPR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Project No. 746

Enclosure:
Replacement Pages 10, 11, and 12 to the Final Safety Evaluation

cc w/encl: See next page

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In addition, the UniStar Nuclear QAPD provides for establishing the necessary measures to implement a reporting program in accordance with the requirements of 10 CFR Part 52, 10 CFR 50.55(e) and/or 10 CFR Part 21, as applicable.

In establishing measures for nonconforming material, the UniStar Nuclear QAPD commits to implement the quality standards described in NQA-1-1994, Basic Requirement 15 and Supplement 15S-1.

3.1.16 Corrective Action

The UniStar Nuclear QAPD follows the guidance of Draft SRP Section 17.5, paragraph II.P, for establishing the necessary measures to promptly identify, control, document, classify, and correct conditions adverse to quality. The UniStar Nuclear QAPD requires personnel to identify known conditions adverse to quality. Reports of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality are documented and reported to responsible management. In case of suppliers working on safety related activities, or similar situations, UniStar Nuclear may delegate specific responsibility of the corrective action program but UniStar Nuclear maintains responsibility for the program's effectiveness.

Section P of the UniStar Nuclear QAPD details that the corrective action program (CAP) includes the following processes, including closure:

- Prompt identification and correction of conditions adverse to quality by all personnel;
- Determining cause and corrective actions, including action to preclude recurrence, for significant conditions adverse to quality;
- Provision to ensure that corrective actions are not nullified by subsequent action;
- Follow-up actions to verify implementation of corrective actions taken for significant conditions adverse to quality.

In addition, the UniStar Nuclear QAPD provides for establishing the necessary measures to implement a reporting program in accordance with the requirements of 10 CFR Part 52, 10 CFR 50.55(e) and/or 10 CFR Part 21, as applicable.

In establishing a corrective action program, the UniStar Nuclear QAPD commits to implement the quality standards described in NQA-1-1994, Basic Requirement 16.

3.1.17 Quality Assurance Records

The UniStar Nuclear QAPD follows the guidance of Draft SRP Section 17.5, paragraph II.Q, for establishing the necessary measures to ensure that sufficient records of items and activities affecting quality are generated, identified, retained, maintained, and retrievable.

When using electronic records storage and retrieval systems, the UniStar Nuclear QAPD provides for compliance with NRC guidance given in Generic Letter 88-18, Regulatory Issue

Summary 2000-18 and associated Nuclear Information and Records Management Association, Inc. (NIRMA) Guidelines TG 11-1998, TG 15-1998, TG 16-1998, and TG 21-1998.

In establishing provisions for records, the UniStar Nuclear QAPD commits to implement the quality standards described in NQA-1-1994, Basic Requirement 17 and Supplement 17S-1.

3.1.18 Quality Assurance Audits

The UniStar Nuclear QAPD follows the guidance of Draft SRP Section 17.5, paragraph II.R, for establishing the necessary measures to implement audits to verify that activities covered by the QAPD are performed in conformance with the requirements established. The audit program is also reviewed for effectiveness as part of the overall audit process. The QAPD provides for conducting periodic internal and external audits. Internal audits are conducted to determine the adequacy of program and procedures, and to determine if they are meaningful and comply with the overall QAPD. Internal audits are performed with a frequency commensurate with safety significance and in such a manner as to assure that an audit of all applicable QA program elements is completed, for each functional area, within a period of two years. External audits determine the adequacy of a supplier's and contractor's quality assurance program. Audit results are documented and reviewed by the responsible management. Management responds to all audit findings and initiates corrective action where indicated. In addition, where corrective action measures are indicated, documented follow-up of applicable areas through inspections, review, re-audits, or other appropriate means, is conducted to verify implementation of assigned corrective action.

In establishing the independent audit program, the UniStar Nuclear QAPD commits to implement the quality standards described in NQA-1-1994, Basic Requirement 18 and Supplement 18S-1.

3.2 Nonsafety-Related SSC Quality Assurance Control

3.2.1 Nonsafety Related SSCs - Significant Contributors to Plant Safety

The UniStar Nuclear QAPD follows the guidance of Draft SRP Section 17.5, paragraph II.V.1, for establishing specific program controls applied to nonsafety-related SSCs that are significant contributors to plant safety, for which Appendix B is not applicable. The UniStar Nuclear QAPD applies specific controls to those items in a selected manner, targeted at those characteristics or critical attributes that render the SSC a significant contributor to plant safety consistent with applicable sections of the QAPD.

3.2.2 Nonsafety Related SSCs Credited for Regulatory Events

In establishing the quality requirements for nonsafety-related SSCs credited for regulatory events, the UniStar Nuclear QAPD follows the guidance of Draft SRP Section 17.5, paragraph II.V.2, and commits to implement the following regulatory guidance:

- The quality requirements to the fire protection system in accordance with Regulatory Position 1.7, "Quality Assurance," in Regulatory Guide 1.189, "Fire Protection for Operating Nuclear Power Plants," April 2001.

- The quality requirements to anticipated transient without a scram (ATWS) equipment in accordance with GL 85-06, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety Related," dated January 16, 1985.
- The quality requirements to station blackout (SBO) equipment in accordance with Regulatory Position 3.5, "Quality Assurance and Specific Guidance for SBO Equipment That Is Not Safety Related," and Appendix A, "Quality Assurance Guidance for Non-Safety Systems and Equipment," in Regulatory Guide 1.155, "Station Blackout," August 1988.

3.3 Regulatory Commitments

The UniStar Nuclear QAPD follows the guidance of Draft SRP Section 17.5, paragraph II.U, for establishing QA program commitments. Further, UniStar Nuclear QAPD commits in Section U to comply with the following NRC Regulatory Guides and other quality assurance standards to supplement and support the QAPD.

- Regulatory Guide 1.26, Revision 3, "Quality Group Classification and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," dated February 1976.
- Regulatory Guide 1.29, Revision 3, "Seismic Design Classification," dated September 1978.
- ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," Part I and II, as described above in Sections 3.1.1 through 3.1.18 of this Safety Evaluation Report (SER).
- ASME NQA-1-1994, Subpart 2.20, "Quality Assurance Requirements for Subsurface Investigations for Nuclear Power Plants." UniStar Nuclear commits to this subpart for subsurface investigation activities.
- Nuclear Information and Records Management Association, Inc. (NIRMA) Technical Guides, as described in Section 3.1.17 of this SER.

4.0 CONCLUSION

The UniStar Nuclear QAPD follows the guidance and conforms to the format of Draft SRP Section 17.5. The NRC staff used acceptance criteria of Draft SRP Section 17.5 as the basis for evaluating the acceptability of the UniStar Nuclear QAPD in conformance with the provisions of 10 CFR 52.79(b), 10 CFR 50.34(a)(7), and Appendix B to 10 CFR Part 50. On the basis of the NRC staff's review of the UniStar Nuclear QAPD, the NRC staff concludes that:

1. The UniStar Nuclear QAPD adequately describes the authority and responsibility of management and supervisory personnel, performance/verification personnel, and self-assessment personnel.
2. The UniStar Nuclear QAPD adequately provides for organizations and persons to perform verification and self-assessment functions with the authority and independence

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