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To: "Christian Araguas" <CJA2@nrc.gov>, "William Burton" <WFB@nrc.gov>
Date: 11/6/2007 5:18:02 PM
Subject: SNC Letter AR-07-1801 transmitting RAI Involving QA Controls for LWA-2

> An electronic copy of Southern Nuclear's letter, AR-07-1801, dated November
> 6, 2007 is attached. In addition, a hard copy has been transmitted to the
> NRC Document Control desk via FedEx.

>

> <<AR-07-1801 RAI Ltr #8 Resp.pdf>>

> Thank you,

>

> Dana Williams

> Southern Nuclear Operating Company

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>

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Created By: DANAWILL@SOUTHERNCO.COM

Recipients

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"William Burton" <WFB@nrc.gov>

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Tom Tynan
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November 6, 2007

Docket No.: 52-011

AR-07-1801

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Early Site Permit Application
Response to Request for Additional Information Involving
Quality Assurance Controls for Limited Work Authorization-2

Ladies and Gentlemen:

By letter dated August 15, 2007, Southern Nuclear Operating Company (SNC) submitted Supplement 2-S1 for the Vogtle Early Site Permit (ESP) Application to the U.S. Nuclear Regulatory Commission (NRC). That supplement requested NRC approval to perform selected Limited Work Authorization-2 (LWA-2) activities at the Vogtle Electric Generating Plant (VEGP) site. By letter dated October 1, 2007, the NRC provided SNC with Request for Additional Information (RAI) Letter No. 8 concerning quality assurance (QA) controls during LWA activities. This letter provides SNC's response to these QA-related RAIs.

SNC's Nuclear Development Quality Assurance Manual (NDQAM) is being revised to incorporate Nuclear Energy Institute (NEI) Technical Report NEI 06-14A, "Quality Assurance Program Description." Incorporation of NRC-approved NEI 06-14A will answer many of the questions identified in RAI Letter No. 8. The revised NDQAM will be provided in Revision 3 to the ESP application, which is scheduled for submittal by November 30, 2007.

The SNC contact for this response letter is J. T. Davis at (205) 992-7692.

Mr. T. E. Tynan states he is Vice President of Vogtle Electric Generating Plant site, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Tom E. Tynan

Sworn to and subscribed before me this 6th day of November, 2007



Melba J. Kicklighter

Notary Public

My commission expires: Jan. 11, 2011

TET/BJS/dmw

Enclosure: Response to October 1, 2007 RAI Letter No. 8 for the Vogtle ESP Application
Involving QA Controls During LWA

cc: Southern Nuclear Operating Company

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Mr. J. A. Miller, Senior Vice President, Nuclear Development (w/o enclosure)
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File AR.01.01.06

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Mr. O. C. Harper, Vice President, Resource Planning and Nuclear Development (w/o enclosure)

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Municipal Electric Authority of Georgia

Mr. C. B. Manning, Senior Vice President and Chief Operating Officer (w/o enclosure)

Dalton Utilities

Mr. D. Cope, President and Chief Executive Officer (w/o enclosure)

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Ms. K. K. Patterson, Project Manager (w/o enclosure)

Southern Nuclear Operating Company

AR-07-1801

Enclosure

Response to October 1, 2007 RAI Letter No. 8 for the Vogtle ESP Application

Involving QA Controls During LWA

Introduction

17.5-1 10 CFR 52.17 (a)(1)(xi) requires that the applicant include a quality assurance program description (QAPD) to be applied to design, fabrication, construction, and testing of the structures, systems, and components of those portions of the facilities that are within the scope of the LWA-2 request. The QAPD shall include a discussion of how the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied. Part I, Section 1.1 of the SNC Nuclear Development Quality Assurance Manual (NDQAM) provides information on activities to which the NDQAM applies. For consistency with the above regulations, the staff needs clarification of the overall scope (e.g., ESP/LWA) that applies or to which the NDQAM could apply, in addition to the list of activities already mentioned. The staff also recommends deletion of all references to combined operating license (COL) activities.

Response:

The SNC Nuclear Development Quality Assurance Manual (NDQAM) is being revised to implement the approved Nuclear Energy Institute (NEI) Technical Report NEI 06-14A, "Quality Assurance Program Description." In so doing, the activities to which it applies will reflect those in bracket text of NEI 06-14A. SNC will also include the additional activity of Limited Work Authorization in the list in Part I, Section 1.1 of the manual.

The SNC Nuclear Development Quality Assurance Manual also serves as the implementation basis for the Combined Operating License Application submittal planned for next year. It would, therefore, be inappropriate to delete references to COL activities from this document.

Organization

17.5-2 SRP Section 17.5, paragraph II.A.4, states that there should be independence between the organization performing checking functions from the organization responsible for performing the functions. In order to satisfy the Three Mile Island (TMI) related requirement contained in 10 CFR 50.34(f)(3)(iii)(A), clarify how SNC will implement measures to control the independence of organizations consistent with Section 17.5 of the Standard Review Plan (SRP).

Response:

By implementing the approved NEI 06-14A, new Part II, Section 1.12 is being added to the NDQAM. (This was Section 1.9 of NEI-06-14A.)

17.5-3 SRP Section 17.5, paragraph II.A.7, states that management ensures that the size of the QA organization is commensurate with its duties and responsibilities. In order to satisfy the TMI-related requirement contained in 10 CFR 50.34(f)(3)(iii)(F), clarify how SNC will implement measures to ensure that the size of the quality assurance (QA) organization is commensurate with its duties and responsibilities.

Response:

By implementing the approved NEI 06-14A, SNC is also adding an additional paragraph to Part II, Section 1 to the NDQAM addressing the sizing of the QA organization.

Quality Assurance Program

17.5-4 SRP Section 17.5, paragraph II.B.1, states that management implementing portions of the QAPD should assess the part of the program for which they are responsible and assure its effective implementation at least once each year or at least once during the life of the activity, whichever is shorter, or may extend it to once every two years. Section 2 of the SNC NDQAM states that senior management is regularly apprised of audit results evaluating the adequacy of implementation of the Nuclear Development Quality Assurance Program (NDQAP) through the audit functions described in the Section 18, Audits, of the NDQAM. Section 2.4 of the SNC NDQAM states that reviews of the status and adequacy of the NDQAP and its implementation will be conducted on an ongoing basis via senior management review of quality assurance audit reports. In addition, Section 18.1 of the SNC NDQAM provides measures for the performance of audits, and states that internal audits of selected aspects of licensing, design and construction phase activities are performed with a frequency commensurate with safety significance and in a manner which assures that audits of safety-related activities are completed. Clarify how the SNC management will assess the part of the program for which they are responsible and assure is effective implementation consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC agrees to remove the current NDQAM wording in favor of similar words from the SRP. The term "activity" applies as described in NDQAM Part I, Section 1.1 and does not apply to a specific/discrete task (e.g., a specific weld or pump overhaul).

17.5-5 SRP Section 17.5, paragraph II.S.2, states the qualification criteria for individuals responsible for managing the implementation of the QA plan. Section 2.6 of the SNC NDQAM provides the minimum qualifications of the Quality Assurance Manager and the Nuclear Development Quality Assurance Project Engineer. However, these qualifications do not provide for requirements for management and supervisory skills and experience or training in leadership, interpersonal communication, management responsibilities, motivation of personnel, problem analysis and decision making, and administrative policies and procedures. Clarify how the SNC NDQAM will address these criteria consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is adding an additional paragraph to Part II, Section 2.6 to the NDQAM addressing the qualifications of the QA management.

17.5-6 SRP Section 17.5, paragraph II.S.3, states the qualification criteria for individuals responsible for planning, implementing, and maintaining the QA plan. Clarify how the SNC NDQAM will provide for these criteria consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is adding an additional paragraph to Part II, Section 2.6 to the NDQAM addressing the qualifications of those planning, implementing and maintaining the QA plan.

Control of Purchased Material, Equipment, and Services

17.5-7 SRP Section 17.5, paragraph II.L.8, states that for procurement of commercial-grade calibration services for safety-related applications, laboratory accreditation programs administered by the National Institute of Standards and Technology and by the American Association for Laboratory Accreditation (A2LA) are acceptable in lieu of a supplier audit, commercial-grade survey, or in process surveillance, provided that certain conditions are met. Paragraph II.L.8.h also states that the proposed alternative is limited to domestic (within the United States) calibration service suppliers. Clarify how the SNC NDQAM will implement the procurement of commercial-grade calibration services consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 7.2 to reflect recognition of International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA). NDQAM Part II, Section 7.2 is also being clarified to be limited to calibration laboratories that hold a domestic accreditation by NAVLAP or A2LA as recognized through the ILAC MRA.

Control of Measuring and Test Equipment

17.5-8 SRP Section 17.5, paragraph II.L.4, states that measuring and test equipment are calibrated, adjusted, and maintained at prescribed intervals or, prior to use, against certified equipment having known valid relationships to nationally recognized standards. If no nationally recognized standards exist, the bases for calibration are documented. Section 12 of the SNC NDQAM provides the controls for the calibration of measuring and test equipment, and includes alternate methods for calibration. Clarify if the bases for these alternate calibration methods are documented to ensure consistency with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 12 such that the provisions for an alternate method of calibration are not included.

Handling, Storage, and Shipping

17.5-9 Section 13 of the SNC NDQAM provides measures to control the handling, shipping, and storage of items important to safety. In Section 13.2 of the NDQAM, titled “NQA-1-1994 Commitment/Exceptions,” SNC commits to and provides clarifications and exceptions to Basic Requirement 13, Supplement 13S-1, Subpart 2.1, Subpart 2.2, and Subpart 2.3 of NQA-1-1994. The exception to Subpart 2.1 states the following:

“Subpart 2.1, sections 3.1 and 3.2, establish criteria for classifying items into cleanness classes and requirements for each class. Instead of using the cleanness level system of Subpart 2.1, SNC plants may establish cleanness requirements on a

case-by-case basis, consistent with the other provisions of Subpart 2.1. SNC establishes appropriate cleanliness controls for work on safety related equipment to minimize introduction of foreign material and maintain system/component cleanliness throughout maintenance or modification activities, including documented verification of absence of foreign materials prior to system closure.”

Describe how SNC will implement measures to control the cleaning of materials and components without implementing the cleanness level system of Section 3.2 of Subpart 2.1, to ensure consistency with RG 1.37, Revision 1. In addition, the staff recommends removing the last sentence of this paragraph if it only applies to operational quality assurance program descriptions, as stated in Section 17.5, paragraph II.M.8, of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 13 such that the provisions for an alternate method of cleanness level system are not included.

17.5-10 In Section 13.2 of the NDQAM, titled “NQA-1-1994 Commitment/Exceptions,” SNC commits to and provides clarifications and exceptions to Subpart 2.2 of NQA-1-1994. The first exception to Subpart 2.2 states the following:

“Subpart 2.2, sections 3.2 and 3.5: For items in storage, as determined by facility management, the packaging requirements described under section 3, Packaging, may include alternate methods of affording required protection such as maintaining a storage atmosphere free from harmful contaminants in concentrations that could produce damage to the stored items, or utilizing storage practices that obviate the need for capping all openings.”

Describe how SNC will implement measures to ensure protection of items during storage against corrosion, contamination, physical damage, or any other effect that would lower the quality of the items, consistent with the four levels of protection described in Section 2 of Subpart 2.2.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 13 such that the provisions for an alternate method of required protection are not included.

17.5-11 RG 1.38, “Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants,” Revision 2, describes quality assurance criteria for the packaging, shipping, receiving, storage, and handling of items. The Regulatory Guide (RG) endorses the guidance contained in ANSI N45.2.2-1972, “Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants.” Section 13.2 of the NDQAM establishes the commitment to NQA-1-1994, Subpart 2.2, and includes clarifications and exceptions to these requirements. The third exception to Subpart 2.2 states the following:

“Subpart 2.2, section 7.1 refers to Subpart 2.15 for requirements related to handling of items. The scope of Subpart 2.15 includes hoisting, rigging and transporting of

items for nuclear power plants. This scope exceeds the scope of the NRC’s original endorsement of ANSI N45.2.2 in Regulatory Guide 1.38, and establishes requirements for which there is no NRC regulatory position. In lieu of compliance with Subpart 2.15, SNC establishes and implements controls over hoisting, rigging and transport activities to the extent necessary to protect the integrity of the items involved, as well as potentially affected nearby structures and components. For re-rating of lifting equipment to allow “special lifts,” SNC performs dynamic load testing over the full range of the lift using test loads at least 110% of the lift weight. Dynamic tests include raising, lowering and traversing the load. Where required, SNC complies with applicable hoisting, rigging and transportation regulations and codes.”

The staff request SNC to describe the extent of the program for hoisting, rigging and transport activities, including exceptions to Subpart 2.15, if any.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 13 such that no exception relating to hoisting, rigging and transporting of items in Subpart 2.2 is taken.

Corrective Action

17.5-12 SRP Section 17.5, paragraph II.P.3, states that specific responsibilities within the corrective action program may be delegated, but the applicant or holder maintains responsibility for the program’s effectiveness. Section 16 of the SNC NDQAM does not explicitly address these criteria. Clarify how the SNC NDQAM will address this criteria consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 16 to include a statement that, although SNC may delegate specific responsibilities of the Corrective Action program, SNC maintains responsibility for the program’s effectiveness.

17.5-13 SRP Section 17.5, paragraph II.P.4, states that the corrective action program should require all personnel to identify conditions that are adverse to quality. Section 16 of the SNC NDQAM does not explicitly address these criteria. Clarify how the SNC NDQAM will address this criteria consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 16 to include a statement that SNC procedures require personnel to identify known conditions adverse to quality.

Quality Assurance Records

17.5-14 SRP Section 17.5, paragraph II.Q.4, states that document access controls, user privileges, and other appropriate security controls must be established. The SNC NDQAM does not provide measures for security control of records. Clarify how the SNC NDQAM will implement measures to provide document access controls and security controls consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 17 to include access controls and user privileges in the listing of procedural requirements.

17.5-15 SRP Section 17.5, paragraph II.Q.5, states, in part, that design documentation and records include not only the final design documents, such as drawings and specifications, and revisions thereto, but also documentation which identifies the important steps, including sources of design inputs that support the final design. The SNC NDQAM does not provide measures for incorporation of documentation of design input sources that support the final design as part of the record retention program. Clarify how the SNC NDQAM will implement measures to control design records consistent with Section 17.5 of the SRP.

Response:

The clarification is addressed in NQA-1, Supplement 3S-1, Section 7 to which SNC has committed.

Audits

17.5-16 SRP Section 17.5, paragraph II.R.5, states that periodic inspections of systems, software applications, and media are performed to ensure electronic records retrievability, integrity, and retention period. Clarify how the SNC NDQAM will implement measures to inspect electronic record systems, software applications, and media consistent with Section 17.5 of the SRP.

Response:

SNC will include a statement in the revised NDQAM to ensure that periodic inspections of systems, software applications, and media are performed to ensure electronic records retrievability, integrity, and retention period.

17.5-17 SRP Section 17.5, paragraph II.R.10, states that when any work carried out under the requirements of the QA program is delegated to others, the work is to be audited by the QA audit program. Clarify how the SNC NDQAM will provide measures to address the audit of QA program requirements delegated to others, consistent with Section 17.5 of the SRP.

Response:

Work delegated to others will be controlled either under the SNC QA program (internal audits) or under a contract (supplier audits) for those specific services. Internal and supplier audits will cover the auditing of work delegated to others.

Regulatory Commitments

17.5-18 SRP Section 17.5, paragraph II.U.1, states that the applicant should commit to the most recent revision of the regulatory guides (RGs). Part III of the SNC NDQAM commits to revision 3 of RGs 1.26, 1.29, and RG 1.97. RGs 1.26 and 1.29 were revised in March 2007, and RG 1.97 was revised in June 2006. Justify why the SNC NDQAM does not commit to the latest revisions of these RGs consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part IV, to reference only Regulatory Guides 1.26 and 1.29. The latest revision of these Regulatory Guides are, however, referenced.

17.5-19a SRP Section 17.5, paragraph II.U.1, states that the applicant commits to the most recent revision of the regulatory guides (RGs). Part III of the SNC NDQAM does not include a commitment to RG 1.37. Justify why the SNC NDQAM does not commit to the latest revision of this RG, consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part IV, to reference only Regulatory Guides 1.26 and 1.29. The latest revision of these Regulatory Guides are, however, referenced.

b SRP Section 17.5, paragraph II.U.2, states that the applicant commits to the standards listed in this section. Part III of the SNC NDQAM does not include a commitment to Subpart 2.20 of NQA-1-1994. Justify why the SNC NDQAM does not commit to this Subpart, consistent with Section 17.5 of the SRP.

Response:

By implementing the approved NEI 06-14A, SNC is revising NDQAM paragraph Part II, Section 3.5, to commit to Subpart 2.20 of NQA-1-1994.