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It is the staff's understanding that COL applicants intend to use the NEI 06-14, Revision 7 as their quality assurance program for new reactors. As described in the staff's SER for NEI 06-14, applicants must address in their QA program commitments to different Regulatory Guides, including RG 1.33, since NEI 06-14 does not make an explicit commitment to this RG. RG 1.33, specifically, provides a method to meet the quality assurance requirements for the operating phase.

The staff concurs that operating plants have provided a precedent for withdrawing an explicit commitment to RG 1.33 and N18.7 (Dominion Quality Assurance Topical Report, DOM-QA-1, Revision 3 - specifically pages C-11 and C-12 - ADAMS ML081610731).

However, the NRC staff's review of NEI 06-14 Revision 7 found that the quality assurance requirements for the operating phase were not fully addressed in Revision 7 of NEI 06-14 with the commitment to NQA-1. NEI 06-14 does not fully address the administrative controls of ANSI N18.7-1976.

***In order for an applicant to demonstrate that their QA program has incorporated all of the administrative controls not included in NQA-1-1994, the applicant must develop a line by line comparison of the requirements of ANSI N18.7-1976, their QA program and NQA-1-1994 similar to those prepared by operating reactors to support adoption of NQA-1-1994 (see NMC and Dominion).***

In its review of NEI 06-14, Revision 7, and the SNOC QATR, the NRC staff has identified the following deficiencies with respect to incorporating the guidance of ANSI N18.7, 1976 and its endorsing regulatory guide, RG 1.33, Revision 2.

1. The SNOC QATR makes the following commitment: "In establishing procedural controls, as stated in position C.1 of RG 1.33, Revision 2, SNC commits to use Appendix A of RG 1.33 as guidance for establishing the types of procedures that are necessary to control and support plant operation." NEI 06-14 does not make a similar commitment. COL applicants should include this commitment or demonstrate how NEI 06-14 complies with this regulatory position.

2. Appendix E of the SNOC QATR contains a description of the various types of procedures used by SNC to govern the design, operation, and maintenance of its operating nuclear generating plants. The Appendix is added in accordance with the guidelines of N18.7, and addresses procedural content and specific procedural guidance for administrative control procedures. SNOC QATR includes this appendix to conform to the guidance provided by Section 5 of N18.7, 1976. NEI 06-14 does not incorporate similar guidance. COL applicant should incorporate this guidance or demonstrate how NEI 06-14 conforms to this guidance.

**Section 4, Procurement Document Control:**

NEI 06-14 does not specify the following bold phrase:

...purchased items (components, spares and replacement parts necessary for plant design, construction, operation, refueling, maintenance and modifications) and services are subject to quality and technical requirements **at least equivalent to those specified for original equipment or specified by properly reviewed and approved revisions to the original requirements** to assure the items are suitable for the intended service, and are of acceptable quality, consistent with their effect on safety.

### **Section 7, Control of Purchase Material, Equipment, and Services**

NEI 06-14 does not address maintenance and modifications in Section 7.1:

Verification actions include testing, as appropriate, during design, fabrication and construction activities, **including those associated with plant maintenance or modifications.**

### **Section 10, Inspection**

NEI 06-14 does not address maintenance and modifications in Section 10:

Types of inspections may include those verifications related to procurement, such as source, in-process, final, and receipt inspection, as well as **maintenance, modification, in-service**, and operational activities.

NEI 06-14 states ... as well as **construction, installation**, and operational activities.

### **Section 12, Control of Measuring and Test Equipment**

SNOG QATR includes 5 requirements (bullets) for control of measuring and test equipment that are not included in NEI 06-14.

NEI 06-14 does not provide a commitment to NQA-1-1994 Subpart 2.16.

### **Section 14, Inspection, Test, and Operating Status**

NEI 06-14 does not provide a commitment to NQA-1-1994 Subpart 2.18.

### **Section 15, Nonconformances**

SNOG QATR requires an individual discovering a nonconforming condition to identify, describe, and document the nonconformance with the corrective action process. NEI 06-14 does not.

NEI - Address this difference and update the document to describe the identification/resolution process for nonconformances.

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### **Section 18. Audits**

SNOG QATR provides commitments for an operational audit program consistent with N18.7.

NEI 06-14 does not. NEI should compare the audit commitments of the two programs on a line by line basis and discuss how NEI 06-14 meets the guidance of N18.7 and RG 1.33, regulatory position C.4.

### **ANSI 18.7, Section 4.4, "Review Activities of the Onsite Operating Organization"**

The NEI matrix for this item states: "One review function(IRN/IRC) is adequate per NMC SER ML0432701710."

- 1) The document referenced was superseded by ML050210276, which is the correct reference.
- 2) The referenced safety evaluation addresses the independent review program, which is addressed under Section 4.3, which is different from the operational organization addressed by Section 4.4.

The subject safety evaluation provides relief for commitments under 4.5, by transferring some commitments to the onsite function (4.4). It does not change the review responsibilities of the onsite operating organization. Generally, responsibilities of the onsite organization, as described in Section 4.4 include safety matters related to the everyday operation of the plant while responsibilities of the offsite organization, as described in Section 4.5, relate to a review of safety matters in retrospect. The offsite organization generally meets once or twice a year, while the operating organization meets frequently, generally weekly or monthly as emergent safety issues arise. The subject safety evaluation also refers to the NMC Nuclear Oversight Organization, which had responsibilities beyond those described in Section 4.5.

In conclusion, the NEI matrix suggests that responsibilities for safety matters assigned to the onsite organization under Section 4.4 may be performed by another organization. This conclusion is not warranted by the subject NRC safety evaluation. It should be deleted.