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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. NA3-10-003
Docket No. 52-017
COL/BCB

DOMINION VIRGINIA POWER
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION
QUALITY ASSURANCE PROGRAM DESCRIPTION REVISION

As discussed with NRC staff in a conference call on December 14, 2009, Dominion has revised the North Anna Unit 3 Quality Assurance Program Description (QAPD), Topical Report DOM-QA-2. This revision includes the addition of Part V, "Additional Quality Assurance and Administrative Controls for the Plant Operational Phase," and incorporates other changes needed to be consistent with NEI-06-14-A, Revision 1, as approved by the NRC. The revision also clarifies Dominion's commitments to the Regulatory Guides in Part IV, reflects a Document Control and Records function organizational change, and incorporates editorial changes that improve the overall quality of the QAPD. This revision does not change the intent of program requirements and does not affect compliance with 10 CFR 50, Appendix B.

Two enclosures are provided to facilitate the NRC's review of the revised QAPD. Enclosure 1 provides a summary of the changes and a tabular comparison of the QAPD with the requirements of RG 1.33 and ANSI N18.7-1976. Enclosure 2 provides a marked-up copy of the QAPD that depicts the specific changes.

The revised QAPD will be incorporated into the next submission of the North Anna Unit 3 COLA. Please contact Regina Borsh at (804) 273-2247 (regina.borsh@dom.com) if you have questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Eugene S. Grecheck", written in a cursive style.

Eugene S. Grecheck

D089
NRD

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

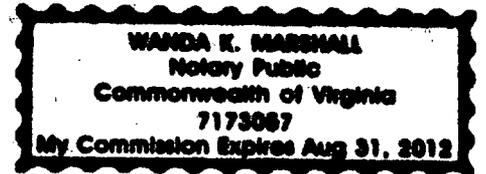
The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President-Nuclear Development of Virginia Electric and Power Company (Dominion Virginia Power). He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 29th day of March, 2010

My registration number is 7173057 and my

Commission expires: August 31, 2012

Wanda K. Marshall
Notary Public



Enclosures:

1. Summary and Evaluation of Changes to North Anna Unit 3 Quality Assurance Program Description, Topical Report DOM-QA-2
2. Marked-up Copy of North Anna Unit 3 Quality Assurance Program Description, Topical Report DOM-QA-2

Commitments made by this letter:

1. The revised QAPD will be incorporated into the next submission of the North Anna Unit 3 COLA.

cc: ~~U.S.~~ Nuclear Regulatory Commission, Region II
C. P. Patel, NRC
J. B. Jessie, NRC
J. T. Reece, NRC

ENCLOSURE 1

**Summary and Evaluation of Changes to
North Anna Unit 3 Quality Assurance Program Description,
Topical Report DOM-QA-2**

Summary of Changes

Editorial Changes

A number of editorial changes in the use of "Dominion" in place of "North Anna Unit 3" have been made throughout the QAPD to be consistent with the original intent of the program description. These changes are related to situations where the procedures and/or personnel may be from the Dominion fleet rather than specific to the North Anna Unit 3 project. Other editorial changes have been made to correct spelling and punctuation, and to provide consistent use of the terms QAP and QAPD. Since these are editorial changes that do not change the intent of the specified requirements, the QAPD continues to comply with Appendix B to 10 CFR Part 50. These editorial changes are not individually addressed.

Part I Changes

Section 1.1 – Decommissioning was removed from the list of applicable activities since Dominion is not currently performing quality-affecting activities related to decommissioning.

Part II Changes

Section 1, paragraph 2 – Changed the term "Quality Assurance organization" to "Quality Assurance staff" to be more consistent with the regulation and avoid confusing the QA staff with the entire QA organization described in Part II, Section 1. This is consistent with the language of 10 CFR 50.34(f)(3)(iii)(F).

Section 1, paragraph 3 – Added "(preconstruction)" after Unit 3 developmental to clarify the timing of this phase of applicability. This change clarifies that a QA program that meets 10 CFR 50, Appendix B requirements is being implemented prior to obtaining a license to ensure work that can potentially affect safety-related SSCs is appropriately controlled.

Section 1.1 – Added a sentence regarding the responsibility of the CNO to appoint a chair for the Independent Review Committee (IRC) function and reference to the Part V section that contains the description of the IRC function.

Section 1.2.1 – Clarified the duties and responsibilities of the functional manager for Engineering as it relates to the use of a standard design plant for the North Anna 3 facility. This function remains part of the overall QA organization and continues to meet the requirements of 10 CFR 50, Appendix B, Criterion I.

Section 1.2.1.1 – Clarified the duties and responsibilities of the engineering design services performed for the site as part of work necessary to establish a standard plant design on the North Anna site. Organization Chart II-1 was updated to reflect the use of Bechtel as a supplier to the Nuclear Development group. This function remains part of the overall QA organization as a delegated duty and continues to meet the requirements of 10 CFR 50, Appendix B, Criterion I. The reference to the duties of GEH relative to long-lead items was removed since Dominion has discontinued that purchase agreement. The sentence regarding Dominion reviewing and auditing suppliers on a regular basis to ensure conformance with the quality requirements was deleted since it is redundant to the QA requirements specified in Part II, Section 7.1 of the QAPD. These changes update the QAPD to the current scope of work for North Anna 3.

Section 1.3.2 – In the last sentence, the word "responsibility" was changed to "authority" for clarity of Dominion's overall responsibility for the program and Dominion's ability to delegate authority to others. This change is consistent with the requirements of 10 CFR 50, Appendix B, Criterion I.

Section 1.5.1.2 – Removed the responsibility for the Independent Review Body (IRB) from this management position. The rest of the Dominion fleet uses a review committee approach in performing the independent review functions that are allowed to be performed by either an organizational unit functioning as an Independent Review Body (IRB) or a committee functioning as the Independent Review Committee

(IRC) as delineated in NEI 06-14-A, Rev. 1 (ref. NUREG-0800, SRP 17.5). The North Anna 3 QAPD is changed to use the IRC approach. The IRC reports to the CNO as depicted in the updated organization chart, Figure II-3.

Section 1.6.1.3.1 – Deleted the Document Control and Records function from this part of the organization and relocated to the Operations Support group described in Section 1.7. The QA function remains as part of the overall QA organization; therefore, 10 CFR 50, Appendix B requirements continue to be met.

Section 1.7.1.1 – Added the Document Control and Records function that was relocated from Section 1.6.1.3.1. Organization chart, Figure II-3, was updated to reflect this relocation. This change matches the revised operating organization structure currently in place for the Dominion operating plants. The QA function remains as part of the overall QA organization; therefore, 10 CFR 50, Appendix B requirements continue to be met.

Figure II-1 was updated to show the Bechtel interface with the organization.

Figure II-3 was updated to show the reporting of the IRC to the CNO and the realignment of the Document Control and Records Management function in the Support organization.

Section 2.6 – A new paragraph 4 was inserted to address the qualification requirements for the QA/QC supervisor position during construction. This is an increase in the commitment to quality since there is no description of the supervisor qualifications in the NRC SRP 17.5, or the NEI 06-14-A template. The qualifications identified are consistent with those listed in ANS-3.1-1993 that is applied during the operational phase.

Section 2.7 – The IRB function was removed from this section and inserted in the new Part V of the QAPD where significant administrative controls for the operational phase are described. This is an administrative change in the location of the information. 10 CFR 50, Appendix B does not establish a format for the QAPD, so this change does not affect implementing those requirements and does not reduce the commitment to quality. It should also be noted that the description of the independence review functions performed by an independent review body (IRB) was changed to performance by an independent review committee (IRC). This is further discussed in the change to Section 1.5.1.2 above.

Section 2.8 – This section is renumbered to 2.7 due to the relocation of the former 2.7 content. The application of alternatives and exceptions for the qualification of QC personnel in the first double bullet under NQA-1-1994, Supplement 2S-1 was clarified to apply during the operations phase to preclude any potential conflict with the regulation at 10 CFR 50.34(f)(3)(iii)(C) regarding the independence of the organization performing the checking function from the installing organization. Inspection and test personnel will continue to meet the qualification requirements of NQA-1-1994 stated in the QAPD. Those qualification requirements meet the requirements of 10 CFR 50, Appendix B.

Section 6.1, the second paragraph – The term IRB was changed to IRC to be consistent with the change discussed in Section 1.5.1.2 above. This is an editorial change and does not affect compliance with 10 CFR 50, Appendix B.

Section 7.1, the first paragraph – Operations was added to the list of the covered activities. This clarifies the scope of covered activities and is consistent with the requirements of 10 CFR 50, Appendix B that apply to the operational phase of the plant.

Section 7.2, the last bulleted paragraph – The example in the paragraph was removed to be consistent with the change made to NEI 06-14-A, Rev. 1 (Note 1). Since this was only a cited example and not establishing requirements, this change does not affect implementing the requirements of 10 CFR 50, Appendix B.

Section 10, the first paragraph – Maintenance, modification, and inservice were added to the list of applicable activities. These are all activities that are applicable under 10 CFR 50, Appendix B so their inclusion in this scope is consistent with the Appendix B requirements.

Section 13.2 – Clarified that the commitments are applicable during the operational phase of the plant. These commitments address activities that are applicable under 10 CFR 50, Appendix B so their inclusion in this scope is consistent with the Appendix B requirements.

Section 13.2, first single bullet and subsequent double bullet – Clarified the commitment to NQA-1-1994, Subpart 2.1 during the operational phase regarding the usage of the cleanliness classification system by using an alternative approach that establishes cleanliness requirements on a case-by-case basis consistent with the other provisions of Subpart 2.1. An alternative comparable to this was proposed by NMC as documented in ADAMS, Accession No. ML033070156, and approved by NRC SE as documented in ADAMS Accession No. ML050700416. The SE concluded that the alternative was acceptable in meeting 10 CFR 50, Appendix B requirements.

Section 13.2, second single bullet and the first double bullet following – Clarified the commitment to NQA-1-1994, Subpart 2.2 during the operational phase regarding the establishment of protection levels for items in storage. The alternative allows for establishing controls on a case-by-case basis with due regard for the items complexity, use, and sensitivity to damage and provides for inspection and servicing as necessary to assure that no damage or deterioration exists that could affect the items function. An alternative comparable to this was proposed by NMC as documented in ADAMS, Accession No. ML033070156, and approved by NRC SE as documented in ADAMS Accession No. ML050700416. The SE concluded that the alternative was acceptable in meeting 10 CFR 50, Appendix B requirements.

Section 13.2, third single bullet and the subsequent double bullet – Included a commitment to NQA-1-1994, Subpart 2.3 with a clarification to the zone designation system during the operational phase. The alternative allows Dominion to base its control over housekeeping activities on a consideration of what is necessary and appropriate for the activity involved. An alternative comparable to this was proposed by NMC as documented in ADAMS, Accession No. ML033070156, and approved by NRC SE as documented in ADAMS Accession No. ML050700416. The SE concluded that the alternative was acceptable in meeting 10 CFR 50, Appendix B requirements.

Section 15, the first paragraph – Added a requirement for nonconformance identification to be in accordance with Section 16, Corrective Action, requirements. This change is consistent with the requirements of 10 CFR 50, Appendix B.

Section 15.1 – Clarified the interface between the QA requirements for controlling nonconforming items and the regulatory reporting requirements. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1) as satisfying the requirements of 10 CFR 50, Appendix B.

Section 16, the second paragraph – Clarified the statement regarding corrective action to avoid the implication that a single corrective action program exists. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1) as satisfying the requirements of 10 CFR 50, Appendix B.

Section 16.1 – Clarified the interface between the QA requirements for corrective actions and the regulatory reporting requirements. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1) as satisfying the requirements of 10 CFR 50, Appendix B.

Section 17.1 – Added requirement to use Table 1 of Regulatory Guide 1.28, Rev. 3 in establishing the types of documents to retain as records and the duration for their retention. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1) as satisfying the requirements of 10 CFR 50, Appendix B.

Part III Changes

Section 1.10 – Clarified the requirements for inspection personnel. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

Section 2, the second paragraph – Clarified the QA requirements for the fire protection system by making reference to the SAR chapters that discuss the commitment and details of the fire protection QA requirements. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

Section 2, the third paragraph – Clarified the QA requirements for the nonsafety-related aspects of ATWS by referring to Part III, Section 1. These QA requirements are consistent with what is described in NRC Generic Letter 85-06. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

Section 3, the fourth paragraph – Clarified the QA requirements for the nonsafety-related aspects of SBO by referring to Part III, Section 1. These QA requirements are consistent with what is described in NRC Regulatory Guide 1.155. This change is consistent with that previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

Part IV Changes

Regulatory Guide 1.8, Rev. 3 – The commitment and corresponding clarifications are added.

The alternative at the first bullet under this section clarifies that, in addition to the plant manager, the responsible executive may document and approve alternatives to education and experience requirements for individuals who don't meet the specific requirements of ANS-3.1. This provision allows for appropriate approval in those cases where personnel fulfilling functions described in ANS-3.1 are reporting through a support organization rather than directly to the plant manager.

The clarification at the second bullet identifies that Dominion is using the 1994 version of NQA-1 in lieu of the 1983 version stated in the Regulatory Guide.

The clarification at the third bullet identifies that Dominion is using the qualification requirements for independent review personnel that are described in Part V, Section 2.2 of the North Anna 3 QAPD. The described requirements are consistent with those addressed in Regulatory Guide 1.8.

The clarification at the fourth bullet adds further information regarding the selection, training and qualification requirements for operators that will be cold-licensed by referring to NEI 06-13-A, Rev. 1 that has been separately approved by the NRC for use at new nuclear plants.

Regulatory Guide 1.26, Rev. 3 – Removed the commitment to this Regulatory Guide since it doesn't apply at this time to the North Anna 3 program.

Regulatory Guide 1.28, Rev. 3 – The commitment and corresponding clarifications are added.

The first bullet clarifies that Dominion commits to the 1994 version of NQA-1 rather than the 1983 version that was discussed in the Regulatory Guide. Use of NQA-1-1994 was previously reviewed and approved for NEI 06-14-A (Note 1).

The second bullet clarifies the qualification requirements for inspection and test personnel as described in Part II, Section 2.7 of the North Anna 3 QAPD. This change is consistent with QA requirements previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

The third bullet clarifies the requirements for retention of QA records. This change is consistent with QA requirements previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

The fourth bullet clarifies the requirements for audits. This change is consistent with QA requirements previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

Regulatory Guide 1.29, Rev. 3 – The commitment to this Regulatory Guide was deleted since it doesn't apply at this time to the North Anna 3 program.

Regulatory Guide 1.30 – Added an alternative to this Regulatory Guide through a commitment to implement the requirements of NQA-1-1994, Subpart 2.4 as clarified in the QAPD. The alternative commitment and clarifications were previously reviewed and approved as meeting the requirements of 10 CFR 50, Appendix B. Reference the submittal for the Dominion NFAQPD as documented at ADAMS Accession Nos. ML042470015, ML042470016, ML042470017, ML042470018, ML051300513, ML051300539, ML051300556, and ML052490337; and the clarification previously evaluated under NEI 06-14-A, Rev. 1 (Note 1).

Regulatory Guide 1.33, Rev. 2 – Added alternatives to part of this Regulatory Guide through a commitment to implement the requirements of NQA-1-1994 along with the additional requirements contained in the North Anna 3 QAPD. A similar approach was reviewed and approved for the Dominion NFAQPD as documented at ADAMS Accession Nos. ML042470015, ML042470016, ML042470017, ML042470018, ML042470019, ML051300513, ML051300539, ML051300550, ML051300556, and ML052490337. In support of this alternative, Table 1 at the end of this document provides a comparison of how NQA-1-1994 and the North Anna 3 QAPD satisfy the requirements of Regulatory Guide 1.33, Rev. 2 and ANSI N18.7-1976. The commitment to NQA-1-1994, as clarified in the QAPD, and the additional requirements contained in the QAPD meet the requirements of 10 CFR 50, Appendix B.

Regulatory Guide 1.37, Rev. 1 – Removed the limitation that the application of this guidance was only during the construction and preoperational phase since it will also apply during the operational phase. Applying this guidance during the construction and operational phases is consistent with the requirements of 10 CFR 50, Appendix B.

Regulatory Guide 1.38, Rev. 2 – Added an alternative to this Regulatory Guide through a commitment to implement the requirements of NQA-1-1994, Subpart 2.2 as clarified in the QAPD. The alternative commitment and clarifications were previously reviewed and approved as meeting 10 CFR 50, Appendix B. Reference the submittal for the Dominion NFAQPD as documented at ADAMS Accession Nos. ML042470015, ML042470016, ML042470017, ML042470018, ML051300513, ML051300539, ML051300556, and ML052490337; and NMC approval as documented at ADAMS Accession No. ML050700416.

Regulatory Guide 1.54, Rev. 1 – Added a commitment to this Regulatory Guide. The Regulatory Guide provides guidance on implementing QA measures that meet 10 CFR 50, Appendix B.

Regulatory Guide 1.94, Rev. 1 – Added an alternative to this Regulatory Guide through a commitment to implement the requirements of NQA-1-1994, Subpart 2.5 as clarified in the QAPD. The alternative commitment and clarifications were previously reviewed and approved as meeting 10 CFR 50, Appendix B. Reference the submittal for the Dominion NFAQPD as documented at ADAMS Accession Nos. ML042470015, ML042470016, ML042470017, ML042470018, ML051300513, ML051300539, ML051300556, and ML052490337.

Regulatory Guide 1.116, Rev 0-R – Added an alternative to this Regulatory Guide through a commitment to implement the requirements of NQA-1-1994, Subpart 2.8 as clarified in the QAPD. The alternative commitment was previously reviewed and approved as meeting the requirements of 10 CFR 50, Appendix B. Reference the submittal for the Dominion NFAQPD as documented at ADAMS Accession

Nos. ML042470015, ML042470016, ML042470017, ML042470018, ML051300513, ML051300539, ML051300556, and ML052490337.

Part V Changes

The entire Part V, except Section 2.2, was added to address additional quality assurance and administrative controls that are specific to the operational phase of the plant. These requirements are consistent with those approved by Regulatory Guide 1.33, Rev. 2. Table 1 provides a listing of how these requirements are satisfied through the QAPD and its commitment to NQA-1-1994.

Section 2.2 – The information regarding the independent review function during the operational phase of the plant was relocated from Part II, Section 2.7. In addition to relocating the independent review function material, a change was made in the approach to implementing the independent review by changing from using an IRB to using an IRC. An editorial change is made in the presentation of the independent review function from that of the NEI 06-14-A, Rev. 1 (Note 1) description by placing the information regarding the committee composition and qualification requirements first, followed by the committee's review requirements. This change was made to improve the readability of the section; however, all the requirements contained in NEI 06-14-A, Rev. 1 are retained.

Note 1 NEI 06-14, Rev. 3 was submitted for NRC review and was approved by the NRC Safety Evaluation (SE) as NEI 06-14-A, Rev. 0 as documented at ADAMS Accession No. ML070510300 (but published by NEI as NEI 06-14A, Rev. 4). NEI 06-14, Rev. 7 was submitted by NEI for NRC review and was approved by the NRC as NEI 06-14-A, Rev. 1 as documented at ADAMS Accession No. ML092650695.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
1. Scope		
<p>This Standard provides requirements and recommendations for an administrative controls and quality assurance program necessary to provide assurance that operational phase activities at nuclear power plants are carried out without undue risk to the health and safety of the public. The requirements of this Standard apply to all activities affecting the safety-related functions of nuclear power plant structures, systems, and components. It is not intended to apply to test mobile and experimental reactors nor reactors not subject to U.S. Nuclear Regulatory Commission licensing. However, applicable sections of this Standard should be used as they apply to related activities. Activities included are: design changes, purchasing, fabricating, handling, shipping, storing; cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling and modifying.</p>	<p>NQA-1 Introduction to Parts I and II QAPD Part I, Introduction; Part II, Section 2</p>	
<p>It is recommended that the administrative controls and quality assurance provisions of this Standard be applied to other important plant equipment at a level commensurate with the importance of the equipment to reliable and efficient plant operation. However, it is emphasized that this Standard is directed primarily toward administrative controls and quality assurance associated with safety-related activities, equipment and procedures.</p>	<p>NQA-1 Introduction to Parts I and II QAPD Part I, Introduction; Part II, Section 2</p>	
<p>This Standard incorporates criteria that permit a degree of flexibility, since administrative practices vary among organizations operating nuclear power plants.</p>		<p>NQA-1 and the QAPD are similar in allowing some flexibility based on importance to safety.</p>
<p>The Nuclear Regulatory Commission (NRC) promulgates regulations applicable to many aspects of the design, construction and operation of nuclear power reactors. This Standard contains criteria for administrative controls and quality assurance for nuclear power plants during the operational phase of plant life. This phase is generally considered to commence with initial fuel loading, except for certain preoperational activities. Certain operating activities may commence prior to fuel loading</p>	<p>NQA-1 Introduction to Parts I and II QAPD Part I, Introduction; Part II, Section 2</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>and certain initial construction activities may extend past fuel loading. Owner organizations should identify clearly those activities that fall in these overlapping time periods and should specify whether the activities are to be considered as operational or as construction activities.</p>		
<p>This Standard is intended to be consistent with applicable criteria for quality assurance, including those given in Title 10, Code of Federal Regulations, Part 50, "Licensing of Production and Utilization Facilities," Appendix B. [1]¹ This Standard fully and completely describes the general requirements and guidelines of American National Standard Quality Assurance Program Requirements for Nuclear Power Plants, N45.2-1971, [2] as those requirements and guidelines apply during the operational phase of plant life.</p> <p>Reg. Guide 1.33 – C. Regulatory Position, paragraph 1 – The overall quality assurance program requirements for the operation phase that are included in ANSI N18.7-1976/ANS-3.2 are acceptable to the NRC staff and provide an adequate basis for complying with the quality assurance program requirements of Appendix B to 10 CFR Part 50, subject to the following [NOTE: The Regulatory Positions that followed this statement are inserted into the 'best fit' sections of the N18.7-1976/ANS-3.2 text in this column of the table.]:</p> <p>Reg. Guide 1.33 – C. Regulatory Position 2. Throughout ANSI N18.7-1976/ANS-3.2, other documents required to be included as a part of this standard are identified at the point of reference. The specific acceptability of these standards listed in ANSI N18.7-1976/ANS-3.2 has been addressed in the latest revision of the following regulatory guides:</p>	<p>QAPD Part I, Introduction; Part II, Section 2; Part IV, Commitments</p>	<p>10 CFR 50, Appendix B, for the operational phase is met through a combination of NQA-1 and the QAPD in lieu of a commitment to implement the requirements of ANSI N18.7-1976/ANS-3.2.</p> <p>(Commitment to industry standards is addressed in the nuclear facility's FSAR, [usually chapter 1, and the QAPD referenced in chapter 17]. Most of the listed standards are updated and incorporated into NQA-1.</p> <p>For the QAPD the following cross-reference is provided:</p> <ul style="list-style-type: none"> • N45.2 is replaced by NQA-1-1983 as indicated in Reg. Guide 1.28, Rev. 3 and by the 1994 edition through the NRC approved alternative described in a safety evaluation for Exelon (ref. ADAMS accession No. ML023440300) • N45.2.1 is now NQA-1-1994, Part II, Subpart 2.1

¹ Footnote from N18.7 – "Numbers in brackets refer to corresponding numbers in Section 6, References."

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions.		Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<u>ANSI Standard</u>	<u>Regulatory Guide</u>		
N45.2	1.28		<ul style="list-style-type: none"> • N45.2.2 is now NQA-1-1994, Part II, Subpart 2.2; NQA-1-1994, Part I, Supplement 8S-1 and Part II, Subpart 2.15 also address certain requirements previously in N45.2.2 • N45.2.3 is now NQA-1-1994, Part II, Subpart 2.3 • N45.2.4 is now NQA-1-1994, Part II, Subpart 2.4 • N45.2.5 is now NQA-1-1994, Part II, Subpart 2.5 • N45.2.6 is now NQA-1-1994, Part I, Supplements 2S-1, 2S-2, and Part III, Nonmandatory Appendix 2A-1; Reg. Guide 1.58 has been withdrawn • N45.2.8 is now NQA-1-1994, Part II, Subpart 2.8 • N45.2.9 is now NQA-1-1994, Part I, Supplement 17S-1 and the list of record types and retention periods is included in Table 1 of Reg. Guide 1.28, Rev. 3; Reg. Guide 1.88 has been withdrawn • N45.2.10 is now NQA-1-1994, Part I, Introduction; Reg. Guide 1.74 has been withdrawn • N45.2.11 is now NQA-1-1994, Part I, Supplement 3S-1; Reg. Guide 1.64 has been withdrawn • N45.2.12 is now NQA-1-1994,
N45.2.1	1.37		
N45.2.2	1.38		
N45.2.3	1.39		
N45.2.4	1.30		
N45.2.5	1.94		
N45.2.6	1.58		
N45.2.8	1.116		
N45.2.9	1.88		
N45.2.10	1.74		
N45.2.11	1.64		
N45.2.13	1.123		
N18.1	1.8		
N18.17	1.17		
N101.4	1.54		
<p>Note: N45.2.12 is discussed in NRC documents WASH-1283, "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants," (Grey Book) and WASH-1309, "Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants," (Green Book) and will be endorsed by a regulatory guide upon its approval as an ANSI standard.</p>			

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
		<ul style="list-style-type: none"> Supplement 18S-1; Reg. Guide 1.144 has been withdrawn • N45.2.13 is now NQA-1-1994, Part I, Supplements 4S-1 and 7S-1; Reg. Guide 1.123 has been withdrawn • N18.1 is now ANS-3.1 • N18.17 and Reg. Guide 1.17 have been withdrawn and the applicable requirements included in 10 CFR Part 73 • N101.4 has been withdrawn and replaced with several other standards as discussed in RG 1.54, Rev. 1)
2. Definitions		
2.1 Limitations.		
The definitions given below are applicable specifically to this Standard. Other terms and their definitions are contained in American National Standard, Quality Assurance Terms and Definitions, N45.2.10 [3].	NQA-1, Introduction to Part I	NQA-1 replaces N45.2 and daughters, including N45.2.10
2.2 Glossary of Terms		
<i>administrative controls</i> – Rules, orders, instructions, procedures, policies, practices and designations of authority and responsibility.	QAPD, Part V, Section 1	
<i>audit</i> – A formal, independent examination with intent to verify conformance with established requirements.	NQA-1, Introduction to Part I	NQA-1 provides more clarity
<i>emergency procedures</i> – Written procedures which specify actions, including manipulation of plant controls, to reduce the consequence of an accident or potentially hazardous condition which has already occurred, to implement the emergency plan, or to prepare for possible	QAPD, Part V, Section 3	The intent of the definition is met by the description of the emergency procedures in the QAPD.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
hazardous natural occurrences.		
<i>experiments</i> – Performance of those plant operations carried out under controlled conditions in order to establish characteristics or values not previously known.	QAPD, Part V, Section 1	
<i>independent review</i> – Review completed by personnel not having direct responsibility for the work function under review regardless of whether they operate as a part of an organizational unit or as individual staff members (see review).	QAPD, Part V, Section 2.2	The process is described in the QAPD section rather than a definition.
<i>inspection</i> – Examination, observation, or measurement to determine the conformance of materials, supplies, components, parts, appurtenances, systems, personnel performance, procedures, processes or structures to predetermined requirements.	NQA-1, Introduction to Part I	
<i>maintenance and modification procedures</i> – Written procedures defining the policies and practices by which structures; mechanical, electrical and instrumentation and control systems; and components thereof of a nuclear power plant are kept in a condition of good repair or efficiency so that they are capable of performing their intended functions. As used in this Standard, these procedures apply to those activities performed by maintenance or contractor personnel to maintain, repair or modify safety-related equipment. Related activities are those actions taken by operating personnel to determine that a planned maintenance activity can be safely performed under the existing plant operating conditions, to authorize the release of equipment to be maintained in accordance with equipment control procedures, and to assure that the equipment has been returned to normal operating status at the completion of the maintenance work including verification of functional acceptability. Procedures for these related activities by operating personnel are considered to be operating procedures, but may be included in maintenance procedures.	NQA-1, Subpart 2.18, Sections 2.2 and 4.4.1 QAPD, Part V, Section 4	
<i>nuclear power plant</i> – Any plant using a nuclear reactor to produce electric power, process steam or space heating.	QAPD, Part V, Section 1	

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<i>off-normal condition procedures</i> – Written procedures which specify operator actions for restoring an operating variable to its normal controlled value when it departs from its range or to restore normal operating conditions following a perturbation. Such actions are invoked following an operator observation or an annunciator alarm indicating a condition which, if not corrected, could degenerate into a condition requiring action under an emergency procedure.	QAPD, Part V, Section 4	
<i>onsite operating organization</i> – Onsite personnel concerned with operation, maintenance and certain technical services.	QAPD, Part V, Section 1	
<i>operating activities</i> – Work functions associated with normal operation and maintenance of the plant, and technical services routinely assigned to the onsite operating organization.	QAPD, Part V, Section 1	
<i>operating procedures</i> – Written procedures defining the normal method, means and limits of operation of a nuclear power plant, a plant system or systems, or processes, including actions to be taken by operating personnel for removal from and return to service equipment on which maintenance is to be or has been performed (see also maintenance and modification procedures).	QAPD, Part V, Section 4	
<i>operational phase</i> – That period of time during which the principal activity is associated with normal operation of the plant. This phase of plant life is considered to begin formally with commencement of fuel loading, and ends with plant decommissioning.	QAPD, Part V, Section 1	
<i>owner organization</i> – The organization, including the onsite operating organization, which has overall legal, financial and technical responsibility for the operation of one or more nuclear power plants.	QAPD, Part IV (by commitment to Reg. Guide 1.8 and ANS-3.1)	Defined in ANS-3.1
<i>quality assurance</i> – All those planned and systematic actions necessary to provide assurance that a structure, system or component will perform satisfactorily in service. It applies to all activities associated with doing a job correctly as well as verifying and documenting the satisfactory completion of the work.	NQA-1, Introduction to Part I	

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<i>review</i> – A deliberately critical examination, including observation of plant operation, evaluation of audit results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions (see independent review).	QAPD, Part V	
<i>shall, should and may</i> – The word “shall” is used to denote a requirement; the word, “should” to denote a recommendation; and the word “may” to denote permission, neither a requirement nor a recommendation.	NQA-1, Introduction to Part I (as part of the definition of guideline)	
<i>supervision</i> – Direction of personnel activities or monitoring of plant functions by an individual responsible and accountable for the activities he directs or monitors.	QAPD, Part V	
<i>surveillance testing</i> – Periodic testing to verify that safety-related structures, systems and components continue to function or are in a state of readiness to perform their functions.	QAPD, Part V	
<i>system</i> – An integral part of a nuclear power plant comprising components which may be operated or used as a separate entity to perform a specific function.	QAPD, Part V	
<i>testing</i> – Performance of those steps necessary to determine that systems or components function in accordance with predetermined specifications.	NQA-1, Introduction to Part I	NQA-1 expounds on the definition.
3. Owner Organization		
3.1 General.		
The owner organization shall establish an administrative controls and quality assurance program which complies with this Standard. The program shall be in effect at all times during the operational phase to assure that operational phase activities are carried out without undue risk to the health and safety of the public. The program shall require that decisions affecting safety are made at the proper level of responsibility and with the necessary technical advice and review. The owner organization may delegate to other organizations the work of	QAPD Policy Statement; QAPD Part II, Sections 1.0 and 2.0	

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
establishing and executing the administrative controls and quality assurance program or any part thereof, in accordance with this Standard, but shall retain responsibility therefor.		
3.2 Assignment of Authority and Responsibility.		
<p>It is essential that all members of the organization involved in operation of nuclear power plants, including those at the highest management levels, recognize the necessity that the plants be operated under a well formulated and detailed administrative controls and quality assurance program to assure safety and efficiency. Lines of authority, responsibility and communication shall be established from the highest management level through intermediate levels to and including the onsite operating organization (including those offsite organizational units assigned responsibility for procurement, design and construction, quality assurance, and technical support activities). These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions or in equivalent forms of documentation.</p> <p>The owner organization shall specify in writing the authority and responsibility assigned to individuals and organizations involved in establishing, executing and measuring the overall effectiveness of the administrative controls and quality assurance program required by this Standard.</p>	<p>NQA-1, Basic Requirement 1 and Supplement 1S-1 QAPD, Part I, Section 1.0</p>	
<p>The persons or organizations responsible for defining and measuring the overall effectiveness of the program shall be designated, shall be sufficiently independent from cost and scheduling considerations when opposed to safety considerations, shall have direct access to responsible management at a level where appropriate action can be accomplished, and shall report regularly on the effectiveness of the program to the plant manager and the cognizant offsite management.</p>	<p>NQA-1, Basic Requirement 1</p>	
<p>Persons or organizations performing functions of assuring that the</p>	<p>NQA-1, Basic Requirement 1</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2: Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
administrative controls and quality assurance program is established and implemented or of assuring that an activity has been correctly performed shall have sufficient authority and organizational freedom to: identify quality problems; initiate, recommend or provide solutions, through designated channels; and verify implementation of solutions.		
<p>The organizational structure and the functional responsibility assignments shall be such that:</p> <p>(1) Attainment of program objectives is accomplished by those who have been assigned responsibility for performing work. This may include interim examinations, checks, and inspections of the work by the individual performing the work.</p> <p>(2) Verification of conformance to established program requirements is accomplished by a qualified person who does not have responsibility for performing or directly supervising the work. The method and extent of such verification shall be commensurate with the importance of the activity to plant safety and reliability.</p>	NQA-1, 1S-1, Section 2.1	
<p>In structuring the organization and assigning responsibility, quality assurance should be recognized as an interdisciplinary function involving many organizational components and, therefore, should not be regarded as the sole domain of a single quality assurance group. For example, it may be more appropriate for nuclear engineers to perform reviews of plant nuclear engineering activities rather than quality assurance engineers because of the special competence required to perform these reviews. Quality assurance encompasses many functions and activities and extends to various levels in all participating organizations, from the top executive to all workers whose activities may influence quality.</p>	NQA-1, Supplement 1S-1	
3.3 Indoctrination and Training.		
Provisions shall be made for indoctrination and training of those personnel in the owner organization performing activities affecting quality to assure that suitable proficiency is achieved and maintained. Such personnel also shall be provided training concerning the administrative	NQA-1, Basic Requirement 2 NQA-1, Supplement 2S-4 QAPD, Part II, Section 2	

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
controls and quality assurance program which, as a minimum, shall include the following areas: overall company policies, procedures, or instructions which establish the program; procedures or instructions which implement the program related to the specific job-related activity.		
3.4 Onsite Operating Organization		
3.4.1 General.		
<p>A number of factors influence management in its decision regarding the establishment of an onsite operating organization. These include the owner organization's established staffing policies, the physical size and complexity of the nuclear power plant, the number of units, the extent of assistance provided by offsite technical support organizations, the extent of reliance on consultants and the availability of qualified personnel from other sources to assist in activities, such as initial start-up, refueling, maintenance or modification work.</p> <p>A nuclear power plant onsite operating organization may change with time. For example, the number and qualifications of personnel making up the onsite technical support staff can generally be reduced as a plant progresses through initial operation to operational maturity. Management shall give careful consideration to the timing and extent of such changes.</p>	NQA-1, Supplement 1S-1 QAPD, Part II, Section 1	
3.4.2 Requirements for the Onsite Operating Organization.		
The onsite operating organization shall include one or more individuals knowledgeable in the following fields: nuclear power plant operation; nuclear power plant mechanical, electrical and electronic systems; nuclear engineering; chemistry and radiochemistry; radiation protection; and quality assurance.	QAPD, Part II, Section 1	
Initial incumbents or replacements for members of the onsite operating organization and offsite technical support organizations shall have appropriate experience, training and retraining to assure that necessary competence is maintained in accordance with the provisions of American National Standard for Selection and Training of Nuclear Power Plant	NQA-1, Supplements 2S-1 and 2S-2 QAPD, Part II, Section 2; Part IV, (by commitment to Reg. Guide 1.8/ANS-3.1)	The facility technical specifications also address commitments for training and qualification of the operating staff.

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<p>Personnel, N18.1-1971. [4] Personnel whose qualifications do not meet those specified in N18.1 and who are performing inspection, examination, and testing activities during the operations phase of the plant, including preoperational and start-up testing, shall be qualified to American National Standard Qualifications of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants, N45.2.6-1973 [5], except that the QA experience cited for Levels I, II, and III should be interpreted to mean actual experience in carrying out the types of inspection, examination, or testing activity, being performed.</p>		<p>Between NQA-1-1994 and the QAPD content, alternative requirements that meet the intent of ANSI N45.2.6 are established.</p>
<p>The owner organization shall designate those positions in the onsite operating organization which shall be filled by personnel holding NRC reactor operator and senior reactor operator licenses. Requirements for the minimum number of personnel holding such licenses who shall be present at the plant under various operating conditions and situations shall also be specified.</p>	<p>QAPD, Part II, Section 1; Part IV (by the commitment to ANS-3.1 where it describes functional positions that require an NRC operator license)</p>	<p>The facility technical specifications establish specific requirements for numbers of personnel requiring NRC licenses based on operating conditions/situations.</p>
<p>The Plant Manager shall have overall responsibility for the execution of the administrative controls and quality assurance program at the plant to assure safety. An individual or organizational unit knowledgeable and experienced in nuclear power plant operational phase activities and quality assurance practices shall be designated and assigned the responsibility to verify that the program is being effectively implemented. Depending on the organizational structure, the individual or organizational unit may report functionally to onsite plant management or an offsite organization (see also 3.2). Reporting to onsite plant management is preferable since such an arrangement usually results in improved communications in identifying problems and initiating corrective action. The individual or organizational unit in this case may receive technical guidance from offsite support groups. This individual's or organizational unit's duties and responsibilities shall be such that the required attention can be devoted, as required, to verifying that the program is being effectively executed. The individual or organizational</p>	<p>NQA-1, Basic Requirement 1 and Supplement 1S-1 QAPD, Part II, Section 1 QAPD, Part II, Section 18 for assessing and reporting on the effectiveness of the QA program implementation</p>	

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unit shall report on the effectiveness of the program to the Plant Manager and to other cognizant management as may be designated. Their activities shall be periodically audited by designated offsite personnel.		
4. Reviews and Audits		
4.1 General.		
Programs for reviews and for audits of activities affecting plant safety during the operational phase shall be established by the owner organization to:	NQA-1, Basic Requirement 18 and Supplement 18S-1 QAPD, Part II, Sections 1, 2, 3, 5, 18, and Part V	
(1) Verify that these activities are performed in conformance with this Standard and with company policy and rules, approved operating procedures and license provisions.	NQA-1, Basic Requirement 18 and Supplement 18S-1 QAPD, Part II, Sections 1, 2, 3, 5, 18, and Part V	
(2) Review significant proposed plant changes, tests and procedures	QAPD, Part II, Sections 5, and 18, and Part V, Section 2	
(3) Verify that reportable events, which require reporting to NRC in writing within 24 hours, are promptly investigated and corrected in a manner which reduces the probability of recurrence of such events	QAPD, Part V, Section 2	
(4) Detect trends which may not be apparent to a day-to-day observer	QAPD, Part II, Section 18, and Part V, Section 2	
These programs for reviews and audits shall, themselves, be periodically reviewed for effectiveness by management of the owner organization.	QAPD, Part II, Section 18.2	
The programs provided for reviews and for audits may take different forms. For example, the owner organization may assign these functions to separate established organizational units independent of the onsite operating organization, or may appoint a standing committee comprised of individuals from within or outside the owner organization to perform reviews and to exercise overview of audits. Historically, a committee approach was used to provide both review and audit capability for early commercial nuclear power plants. This approach was employed to make		This paragraph contains general guidance and historical information, no requirements are specified.

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>the most efficient use of personnel with pertinent experience and qualifications. In the ensuing period, the availability of competent personnel has significantly increased as the nuclear power industry has expanded and the sources of trained manpower have responded to the resulting demand. This growing pool of talent in the aggregate, is sufficient to encourage alternative approaches to the review and audit committees commonly used in the past.</p>		
<p>In general, the time required of individuals serving as members of independent review groups is a function of the number of nuclear power plants an owner organization has in operation. For this reason, owner organizations contemplating rapid growth and an expanding commitment to nuclear power should regard the use of committees to meet the independent review functions as an interim approach for effective utilization of available technical expertise. In addition, such owner organizations should include in their expansion planning, provisions for early establishment of organizational units to provide independent review, for recruitment of staff, and for an orderly transition to such an organizational structure in the event a committee approach has been used previously to meet the independent review function</p>		<p>This paragraph provides general guidance information. No requirements are specified.</p>
<p>An independent offsite organizational unit may be assigned review responsibilities including responsibility for reviewing audit reports provided by onsite staff members, or both functions may be assigned to an organizational unit that is independent of line responsibility for operating activities. This Standard does not specify an organizational structure for meeting the review and audit functions, but in lieu thereof delineates essential elements of satisfactorily comprehensive programs for review and for audit in the manner best suited to the owner organization involved.</p>		<p>This paragraph provides general guidance information. No requirements are specified.</p>
<p>4.2 Program Description.</p>		
<p>Written programs for both audits and independent reviews shall be prepared that contain:</p>	<p>NQA-1, Basic Requirement 18 and Supplement 18S-1</p>	

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>(1) Subjects to be audited and independently reviewed.</p> <p>(2) Responsibility and authority of those supervising audits and conducting independent reviews. These responsibilities shall include the identification of problems and the verification of corrective action. Additional responsibilities may include recommendations to appropriate management of solutions to problems and the approval or disapproval of contemplated actions.</p> <p>(3) Mechanisms for initiating audit and independent review activities.</p> <p>(4) Provisions for use of specialists or subgroups.</p> <p>(5) Authority to obtain access to the nuclear power plant operating records and operating personnel to perform audits and independent reviews.</p> <p>(6) Requirements, for distribution of reports and other records to appropriate staff members and managers in the owner organization.</p> <p>(7) Identification of the management position (or positions, if auditors and reviewers have different reporting chains) to which auditors and independent reviewers report.</p> <p>(8) Provisions for assuring that personnel responsible for audit and independent review are kept informed on a timely basis of matters within their scope of responsibility.</p> <p>(9) Provisions for follow-up action, including reaudit of deficient areas where indicated.</p> <p>(10) Other provisions required for effective audits and independent reviews.</p>	<p>QAPD, Part II, Section 18 and Part V, Section 2</p>	
<p>4.3 Independent Review Program.</p>		
<p>Activities occurring during the operational phase shall be independently reviewed on a periodic basis. The independent review program shall be functional prior to initial core loading.</p>	<p>QAPD, Part V, Section 2.2</p>	
<p>4.3.1 Personnel.</p>		
<p>Personnel assigned responsibility for independent reviews shall be</p>	<p>QAPD, Part V, Section 2.2</p>	

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<p>specified, in both number and technical disciplines, and shall collectively have the experience and competence required to review problems in the following areas:</p> <ul style="list-style-type: none"> (1) Nuclear power plant operations (2) Nuclear engineering (3) Chemistry and radiochemistry (4) Metallurgy (5) Nondestructive testing (6) Instrumentation and control (7) Radiological safety (8) Mechanical and electrical engineering (9) Administrative controls and quality assurance practices (10) Other appropriate fields associated with the unique characteristics of the nuclear power plant involved. <p>An individual may possess competence in more than one specialty area. If sufficient expertise is not available from within the owner organization, independent reviews shall be supplemented through outside consultants or organizations. Provisions shall be made to assure that appropriate expertise is brought to bear in reviews of operational phase activities.</p>		
4.3.2 Standing Committees Functioning as Independent Review Bodies		
4.3.2.1 Committee Composition.		
<p>When a standing committee is responsible for the independent review program, it shall be composed of no less than five persons, of whom no more than a minority are members of the onsite operating organization. Competent alternates are permitted if designated in advance. The use of alternates shall be restricted to legitimate absences of principals.</p>	QAPD, Part V, Section 2.2	
4.3.2.2 Meeting Frequency.		
<p>Formal meetings of personnel assigned to a standing committee functioning as an independent review group shall be scheduled as</p>	QAPD, Part V, Section 2.2	

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needed. During the period of initial operation such meetings should be held no less frequently than once per calendar quarter. Subsequently, the meeting frequency shall not be less than twice a year.		
4.3.2.3 Quorum.		
A quorum for formal meetings of the committee held under the provisions of 4.3.2.2 shall consist of not less than a majority of the principals, or duly appointed alternates, and shall be subject to the following constraints: the chairman (or his duly appointed alternate) shall be present for all formal meetings; and no more than a minority of the quorum shall have line responsibility for operation of the plant.	QAPD, Part V, Section 2.2	
4.3.2.4 Meeting Records.		
Minutes of all meetings of the committee shall be prepared and retained. All documentary material reviewed should be identified. Decisions and recommendations made by the committee shall be documented. Meeting minutes shall be disseminated promptly to appropriate members of management having responsibility in the area reviewed. (See also Section 5.2.12.)	QAPD, Part V, Section 2.2	
4.3.3 Organizational Units Functioning as Independent Review Bodies.		
An organizational unit assigned primary responsibility for review of operational phase activities shall report to a designated management representative who is assigned authority and responsibility for effective functioning of the unit and who is not immediately responsible for the performance of the activities to be reviewed. The supervisor of such an organizational unit should schedule periodic formal meetings of his staff, or of appropriate subparts thereof, for the purpose of fostering interaction in reviews of specific operational phase activities.	QAPD, Part V, Section 2.2	
4.3.3.1 Documentation of Reviews.		
Written records of reviews shall be prepared and retained. All documentary material reviewed should be identified. Results of reviews conducted by the unit including recommendations and proposed actions	QAPD, Part V, Section 2.2	

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shall be subject to approval of the supervisor of the unit, and shall be disseminated promptly to appropriate members of management having responsibility in the area reviewed. (See also Section 5.2.12.)		
4.3.4 Subjects Requiring Independent Review.		
The following subjects shall be reviewed by the independent review body:	QAPD, Part V, Section 2.2	
(1) Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). [1] This review is to verify that such changes, tests or experiments did not involve a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). [1]	QAPD, Part V, Section 2.2	
(2) Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the technical specifications or an unreviewed safety question as defined in 10 CFR 50.59(c). [1] Matters of this kind shall be referred to the independent review body by the onsite operating organization (see 4.4) following its review, or by other functional organizational units within the owner organization, prior to implementation.	QAPD, Part V, Section 2.2	Note – change in 50.59 language (“unreviewed safety question” no longer used) – but otherwise covered in QAPD, Part V, Section 2.2
(3) Changes in the technical specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change. Reg. Guide 1.33 – C. Regulatory Position 3. Section 4.3.4, "Subjects Requiring Independent Review," Item (3) states, in part, that changes to the technical specifications or license amendments related to nuclear safety are required to be reviewed by the independent review body prior to implementation. It should be noted that proposed changes to technical specifications or license amendments should be reviewed by the independent review body prior to their	QAPD, Part V, Section 2.2	

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submittal to the Commission for approval.		
(4) Violations, deviations and reportable events, which require reporting to the NRC in writing within 24 hours, such as:	QAPD, Part V, Section 2.2	Regulations for reporting have changed, but the intent of this is addressed in QAPD, Part V, Section 2.2
(a) Violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance	QAPD, Part V, Section 2.2	
(b) Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components	QAPD, Part V, Section 2.2	
(c) Reportable events, which require reporting to the NRC in writing within 24 hours, as defined in the plant technical specifications Review of events covered under this Section shall include the results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.	QAPD, Part V, Section 2.2	Regulations for reporting have changed, but the intent of this is addressed in QAPD, Part V, Section 2.2
(5) Any other matter involving safe operation of the nuclear power plant which an independent reviewer deems appropriate for consideration, or which is referred to the independent reviewers by the onsite operating organization or by other functional organizational units within the owner organization.	QAPD, Part V, Section 2.2	
4.4 Review Activities of the Onsite Operating Organization.		
The onsite operating organization shall provide, as part of the normal duties of plant supervisory personnel, timely and continuing monitoring of operating activities to assist the Plant Manager in keeping abreast of general plant conditions and to verify that the day-to-day operating activities are conducted safely and in accordance with applicable administrative controls. These continuing monitoring activities are considered to be an integral part of the routine supervisory function and	QAPD, Part V, Section 2.1	

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
are important to the safety of plant operation.		
<p>The onsite operating organization <u>should</u> perform reviews periodically and as situations demand, to evaluate plant operations and to plan future activities. The important elements of the reviews <u>should</u> be documented. Such reviews serve a useful purpose but shall not take the place of the reviews and audits described in Sections 4.3 and 4.5, respectively. The onsite operating organization should screen subjects of potential concern to independent reviewers and perform preliminary investigations (see 4.3.4). The Plant Manager, in carrying out his responsibility for overall safety of plant operations, shall be responsible for timely referral of appropriate matters to management and independent reviewers.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.a.</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>a. Section 4.4–The guidelines concerning review activities of the onsite operating organization, except the guideline that refers to screening subjects of potential concern.</p> <p>[NOTE: The affected "should" words are underlined in the N18.7 excerpt above.]</p>	QAPD, Part V, Section 2.1	
4.5 Audit Program.		
A comprehensive system of planned and documented audits shall be carried out to verify compliance with all aspects of the administrative controls and quality assurance program.	NQA-1, Basic Requirement 18 and Supplement 18S-1 QAPD, Part II, Sections 7 and 18.	
Audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of all safety-related functions is completed within a period of two years. Audits shall include as a minimum verification of compliance and	QAPD, Part II, Section 18	The utilities have modified their audit programs over the years to include risk-informed scheduling and controlling the scope of the audits as alternate methods of satisfying the amplified requirements stated in RG

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>effectiveness of implementation of internal rules, procedures (for example, operating, design, procurement, maintenance, modification, refueling, surveillance, test, security and radiation control procedures and the emergency plan), regulations and license provisions; programs for training, retraining, qualification and performance of operating staff; corrective actions taken following abnormal occurrences; and observation of performance of operating, refueling, maintenance and modification activities, including associated record keeping.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 4.</p> <p>Section 4.5, "Audit Program," of ANSI N18.7-1976/ANS-3.2 states that audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to ensure that an audit of all safety-related functions is completed within a period of 2 years. In amplification of this requirement, the following program elements should be audited at the indicated frequencies:</p> <p>a. The results of actions taken to correct deficiencies that affect nuclear safety and occur in facility equipment, structures, systems, or method of operation-at least once per 6 months.</p> <p>b. The conformance of facility operation to provisions contained within the technical specifications and applicable license conditions-at least once per 12 months.</p> <p>c. The performance, training, and qualifications of the facility staff-at least once per 12 months.</p>		<p>1.33 for specific elements to be audited more frequently than every two years.</p>
<p>Written reports of such audits shall be reviewed by the independent review body and by appropriate members of management including those having responsibility in the area audited.</p>	<p>NQA-1, Basic Requirement 18 QAPD, Part II, Section 18, and Part V, Section 2.2</p>	
<p>Those performing the audits may be members of the audited organization; however, they shall not audit activities for which they have immediate responsibility. While performing the audit, they shall not report to a management representative who has immediate responsibility for</p>	<p>NQA-1, Basic Requirement 18</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
the activity being audited.		
Appropriate and timely follow-up action, including reaudit of deficient areas, shall be taken.	NQA-1, Basic Requirement 18	
Periodic review of the audit program shall be performed by the independent review body or by a management representative at least semiannually to assure that audits are being accomplished in accordance with requirements of technical specifications and of this Standard.	QAPD, Part V, Section 2.2	Audits are no longer addressed in the technical specifications. Based on SRP 17.5, the period for evaluating the audit program is two years rather than every six months.
Further guidance on requirements for auditing of quality assurance programs for nuclear power plants exists in draft form. ²		
5. Program, Policies and Procedures		
5.1 Program Description.		
The total program for providing administrative controls and quality assurance during the operational phase may be described in many diverse documents. For example, operating procedures may be compiled in one manual, maintenance procedures in a second manual and Quality Assurance procedures in a third. It is not intended that all source documents be compiled in one master document. However, a summary document shall be compiled by each owner organization to identify the sources, to index such source documents to the requirements of this Standard and to provide a consolidated base for description of the program.	QAPD, Part I, Introduction; Part II, Section 6	
The owner organization shall identify in the program description those structures, systems and components to be covered by the program and	NQA-1, Basic Requirement 2 QAPD, Part II, Section 2	The applicable SAR provides more detail on the SSCs and their

² Footnote from N18.7 "Requirements for auditing of Quality Assurance Programs for Nuclear Power Plants," Proposed American National Standard N45.2.12, trial use (Draft 4, Revision 2) January 1 1976; correspondence should be sent to: Secretary, American National Standards Committee N45, The American Society of Mechanical Engineers, United Engineering Center, 345 East 47 street, New York, NY 10017. The provisions of this draft standard shall be used for audits performed under this section except the audit frequency specified herein shall be used."

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
the major organizational units and their responsibilities. The program shall provide control over activities affecting the quality of the structures, systems and components to an extent consistent with their importance to safety. The program shall take into account the need for special controls, processes, tests, equipment, tools, and skills to attain the required quality and the need for verification of quality by inspections, evaluation or test.		importance to safety. The DCD provides the basis for the list of SSCs that will be maintained.
5.2 Rules of Practice.		
The owner organization shall establish rules and instructions pertaining to personnel conduct and control, including consideration of job-related factors which influence the effectiveness of operating and maintenance personnel, including such factors as number of hours at duty station, availability on call of professional and supervisory personnel, method of conducting operations, and preparing and retaining plant documents. These rules and instructions should provide a clear understanding of operating philosophy and management policies.	QAPD, Policy and Part V	
5.2.1 Responsibilities and Authorities of Operating Personnel.		
The responsibilities and authorities of the plant operating personnel shall be delineated. These shall include, as a minimum: (1) The reactor operator's authority and responsibility for shutting the reactor down when he determines that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection system setpoints and automatic shutdown does not occur. (2) The responsibility to determine the circumstances, analyze the cause, and determine that operations can proceed safely before the reactor is returned to power after a trip or an unscheduled or unexplained power reduction. (3) The senior reactor operator's responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction. (4) The responsibility to believe and respond conservatively to	QAPD, Part I Section 1, and Part V.	QAPD provides overall responsibilities in general terms. The specific responsibilities described here are located in the organizational standards and administrative controls, Technical Specifications and reinforced through the systematic training programs.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>instrument indications unless they are proved to be incorrect. (5) The responsibility to adhere to the plant's Technical Specifications. (6) The responsibility to review routine operating data to assure safe operation.</p>		
<p>5.2.2 Procedure Adherence.</p>		
<p>Procedures shall be followed, and the requirements for use of procedures shall be prescribed in writing. Rules shall be established which provide methods by which temporary changes to approved procedures can be made, including the designation of a person or persons authorized to approve such changes.</p>	<p>NQA-1-1994, Basic Requirements 5 and 6, and Supplement 6S-1. QAPD, Part II, Sections 5 and 6</p>	
<p>Temporary changes which clearly do not change the intent of the approved procedure, shall as a minimum be approved by two members of the plant staff knowledgeable in the areas affected by the procedures. At least one of these individuals shall be the supervisor in charge of the shift and hold a senior operators license on the unit affected. Such changes shall be documented and, if appropriate, incorporated in the next revision of the affected procedure. In the event of an emergency not covered by an approved procedure, operations personnel shall be instructed to take action so as to minimize personnel injury and damage to the facility and to protect health and safety.</p>	<p>QAPD, Part II, Sections 5.1 and 6.2</p>	<p>The QAPD requirements only allow temporary changes that do not change the intent of the procedure. All other changes must be done in accordance with the document control program.</p>
<p>Guidance should be provided to identify the manner in which procedures are to be implemented. Examples of such guidance include identification of those tasks that require: (1) The written procedure to be present and followed step by step while the task is being performed (2) The operator to have committed the procedural steps to memory (3) Verification of completion of significant steps, by initials or signatures of check-off lists.</p>	<p>QAPD, Part II, Section 5.1</p>	
<p>The types of procedures that shall be present and referred to directly are those developed for extensive or complex jobs where reliance on</p>	<p>QAPD, Part II, Section 5.1</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>memory cannot be trusted, e.g., reactor start-up, tasks which are infrequently performed, and tasks in which operations must be performed in a specified sequence. Procedural steps for which actions should be committed to memory include, for example, immediate actions in emergency procedures. Routine procedural actions that are frequently repeated may not require the procedure to be present. Copies of all procedures shall be available to appropriate members of the plant staff. If documentation of an action is required, the necessary data shall be recorded as the task is performed. Examples of procedures requiring verification are furnished in 5.3.4.1 and 5.3.4.2.</p>		
<p>5.2.3 Operating Orders.</p>		
<p>A mechanism shall be provided for dissemination to the plant staff of instructions of general and continuing applicability to the conduct of business. Such instructions, sometimes also referred to as standing orders or standard operating procedures, should deal with job turnover and relief, designation of confines of control room, definition of duties of operators and others, transmittal of operating data to management, filing of charts, limitations on access to certain areas and equipment, shipping and receiving instructions, or other such matters. Provisions <u>should</u> be made for periodic review and updating of standing orders.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.b.</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>b. Section 5.2.3–The guideline concerning review and updating of standing orders.</p> <p>[NOTE: The affected "should" word is underlined in the N18.7 excerpt above.]</p>	<p>QAPD, Part V, Section 3.2</p>	
<p>5.2.4 Special Orders.</p>		
<p>A mechanism shall be provided for issuing management instructions</p>	<p>QAPD, Part V, Section 3.2</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>which have short-term applicability and which require dissemination. Such instructions, sometimes referred to as a special orders, should encompass special operations, housekeeping, data taking, publications and their distribution, plotting process parameters, personnel actions, or other similar matters. Provisions <u>should</u> be made for periodic review, updating and cancellation of special orders.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.c.</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>c. Section 5.2.4–The guideline concerning review, updating, and cancellation of special orders.</p> <p>[NOTE: The affected "should" word is underlined in the N18.7 excerpt above.]</p>		
<p>5.2.5 Temporary Procedures.</p>		
<p>Temporary procedures may be issued during the operational phase: to direct operations during testing, refueling, maintenance and modifications; to provide guidance in unusual situations not within the scope of the normal procedures; and to insure orderly and uniform operations for short periods when the plant, a system, or a component of a system is performing in a manner not covered by existing detailed procedures or has been modified or extended in such a manner that portions of existing procedures do not apply. Temporary procedures shall include designation of the period of time during which they may be used and shall be subject to the review process prescribed in 4.3 and 5.2.15 as applicable.</p>	<p>QAPD, Part V, Section 3.2 Also, temporary procedures for Maintenance activities are covered under NQA-1-1994, Subpart 2.18, Section 2.2.</p>	
<p>Temporary procedures shall be approved by the management representative assigned approval authority</p>	<p>QAPD, Part V, Section 3.2</p>	
<p>5.2.6 Equipment Control.</p>		

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
Permission to release equipment or systems for maintenance shall be granted by designated operating personnel. Prior to granting permission, such operating personnel shall verify that the equipment or system can be released, and determine how long it may be out of service. Granting of such permission shall be documented. Attention shall be given to the potentially degraded degree of protection when one subsystem of a redundant safety system has been removed for maintenance.	NQA-1, Basic Requirement 14 and Subpart 2.18, Section 2.5 QAPD, Part V, Section 4	
After permission has been granted to remove the equipment from service, it shall be made safe to work on. Measures shall provide for protection of equipment and workers. Equipment and systems in a controlled status shall be clearly identified. Strict control measures for such equipment shall be enforced.	NQA-1, Basic Requirement 14 QAPD, Part V, Section 4	
Conditions to be considered in preparing equipment for maintenance include, for example: shutdown margin; method of emergency core cooling; establishment of a path for decay heat removal; temperature and pressure of the system; valves between work and hazardous material; venting, draining and flushing; entry into closed vessels; hazardous atmospheres; handling hazardous materials; and electrical hazards.	NQA-1 Subpart 2.18, Section 2.5 QAPD, Part V, Section 4	
When entry into a closed system is required, control measures shall be established to prevent entry of extraneous material and to assure that foreign material is removed before the system is reclosed.	NQA-1, Subpart 2.3 QAPD, Part II, Section 13.1 and Part V, Section 4	
Procedures shall be provided for control of equipment, as necessary, to maintain personnel and reactor safety and to avoid unauthorized operation of equipment. These procedures shall require control measures such as locking or tagging to secure and identify equipment in a controlled status. The procedures shall require independent verifications, where appropriate, to ensure that necessary measures, such as tagging equipment, have been implemented correctly.	NQA-1, Basic Requirement 14 QAPD, Part V, Section 4	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
Temporary modifications, such as temporary bypass lines, electrical jumpers, lifted electrical leads, and temporary trip point settings, shall be controlled by approved procedures which shall include a requirement for independent verification. A log shall be maintained of the current status of such temporary modifications.	QAPD, Part II, Sections 3 and 14	
The procedures shall also require that the status of inspections and tests performed upon individual items on the nuclear power plant be indicated by the use of markings such as stamps, tags, labels, routing cards, or other suitable means. Suitable means include identification numbers which are traceable to records of the status of inspections and tests.	NQA-1, Basic Requirement 14	
Procedures shall also provide for the identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude inadvertent bypassing of such inspections and tests. In cases where required documentary evidence is not available, the associated equipment or materials must be considered nonconforming in accordance with Section 5.2.14. Until suitable documentary evidence is available to show the equipment or material is in conformance, affected systems shall be considered to be inoperable and reliance shall not be placed on such systems to fulfill their intended safety functions.	NQA-1, Basic Requirement 14	
When equipment is ready to be returned to service, operating personnel shall place the equipment in operation and verify and document its functional acceptability. Attention shall be given to restoration of normal conditions, such as removal of jumpers or signals used in maintenance or testing or such as returning valves, breakers or switches to proper start-up or operating positions from "test" or "manual" positions. When placed into service, the equipment should receive additional surveillance during the run-in period.	NQA-1, Basic Requirement 14, and Subpart 18, Section 2.2 QAPD, Part V, Section 4	
5.2.7 Maintenance and Modifications.		
Maintenance or modifications which may affect functioning of safety-related structures, systems, or components shall be performed in a manner to ensure quality at least equivalent to that specified in original	NQA-1, Introduction to Part II, and Subpart 2.18	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
design bases and requirements, materials specifications and inspection requirements. A suitable level of confidence in structures, systems, or components on which maintenance or modifications have been performed shall be attained by appropriate inspection and performance testing (see also 5.2.17 and 5.3.5).		
Maintenance or modification of equipment shall be preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances which conform to applicable codes, standards, specifications, and criteria. Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step delineations in a written procedure.	NQA-1, Basic Requirement 5, and Subpart 2.18, Section 2.2 QAPD, Part II, Section 5	
Means for assuring quality of maintenance and modification activities (for example, inspections, measurements, tests, welding, heat treatment, cleaning, nondestructive examination and worker qualifications in accordance with applicable codes and standards) and measures to document the performance thereof shall be established. This documentation shall be retained as specified in Section 5.2.12.	NQA-1, Basic Requirements 2, 3, 9, 10, 11, 17 and associated Supplements, and Subparts 2.1 and 2.3. QAPD, Part II, Sections 2, 3, 9, 10, 11, and 17.	
Measures shall be established and documented to identify the inspection and test status of items to be used in maintenance and modification activities. Normally, the point of control for such items should be the plant storage area.	NQA-1, Basic Requirement 14 QAPD, Part II, Section 14	
The following standards contain useful guidance concerning design and construction-related activities associated with modifications and shall be applied to those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during initial plant design and construction: American National Standard Installation, Inspection and Testing of Instrumentation and Electric Equipment During the Construction of Nuclear Power Generation Station, N45.2.4-1972 (IEEE 336-1972) [6]; American National Standard Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel	QAPD, Part IV	ANSI N101.4 has been withdrawn and RG 1.54 revised in July 2000 to address the acceptability of the replacement ANSI Standards.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>During the Construction Phase of Nuclear Power Plants, N45.2.5-1974 [7]; American National Standard Qualifications of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants N45.2.6-1973 [5]; American National Standard Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for Construction Phase of Nuclear Power Plants, N45.2.8-1975 [8] American National Standard Quality Assurance Requirements for the Design of Nuclear Power Plants, N45.2.11-1974 [9]; and American National Standard Quality Assurance for Protective Coating Applied to Nuclear Facilities N101.4-1972 [10]. Considerable care is required in assessing which operational phase activities are comparable in nature and extent to activities normally associated with design and construction.</p>		
<p>5.2.7.1 Maintenance Programs.</p>		
<p>A maintenance program shall be developed to maintain safety-related structures, systems and components at the quality required for them to perform their intended functions.</p>	<p>NQA-1, Subpart 2.18, Section 1</p>	
<p>Maintenance shall be scheduled and planned so as not to compromise the safety of the plant. Planning shall consider the possible safety consequences of concurrent or sequential maintenance, testing or operating activities. Equipment required to be operable for the prevailing mode shall be available, and maintenance shall be performed in a manner such that license limits are not violated. Planning for maintenance shall include evaluation of the use of special processes, equipment and materials in performance of the task, including assessment of potential hazards to personnel and equipment.</p>	<p>NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.1</p>	
<p>General rules for the development of procedures under a maintenance program which is consistent with the provisions of 5.2.7 shall be written before start-up. These general rules shall form the basis for developing the repair or replacement procedures at the time of failure. Procedures required for maintenance of equipment expected to require recurring</p>	<p>NQA-1, Subpart 2.18 QAPD, Part V, Section 3</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>maintenance should be written prior to plant operation. As experience is gained in operation of the plant, routine maintenance should be altered to improve equipment performance, and procedures for repair of equipment shall be improved as appropriate. Approved procedures shall be available for repair of safety-related equipment prior to the performance of such repairs (see also Sections 5.2.2 and 5.2.7).</p>		
<p>A preventive maintenance program including procedures as appropriate for safety-related structures, systems and components shall be established and maintained which prescribes the frequency and type of maintenance to be performed. A preliminary program based on service conditions and experience with comparable equipment should be developed prior to fuel loading. The program should be revised and updated as experience is gained with the equipment.</p>	<p>NQA-1, Subpart 2.18, Section 3</p>	
<p>The causes of malfunctions shall be promptly determined, evaluated and recorded (see also Sections 4.3 and 4.4). Experience with the malfunctioning equipment and similar components shall be reviewed and evaluated to determine whether a replacement component of the same type can be expected to perform its function reliably. If evidence indicates that common components in safety-related systems have performed unsatisfactorily, corrective measures shall be planned prior to replacement or repair of all such components. Replacement components <u>should</u> have received adequate testing or <u>should</u> be of a design for which experience indicates a high probability of satisfactory performance. Consideration shall be given to phased replacement to permit inservice performance of the new component to be evaluated and thereby minimize the possibility of a hidden deficiency producing a systematic failure. An augmented testing and inspection program <u>should</u> be implemented following a large scale component replacement (or repair) until such time as a suitable level of performance has been demonstrated.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.d. The guidelines (indicated by the verb "should") of ANSI N18.7-</p>	<p>NQA-1, Basic Requirement 16 and Subpart 2.18, Section 4</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>d. Section 5.2.7.1—The guidelines that address adequate design and testing of replacement parts.</p> <p>[NOTE: The affected "should" words are underlined in the N18.7 excerpt above.]</p>		
<p>5.2.7.2 Modifications.</p>		
<p>Design activities associated with modifications of safety-related structures, systems, and components shall be accomplished in accordance with N45.2.11.1974. [9]</p>	<p>NQA-1, Basic Requirement 3 and Supplement 3S-1 QAPD, Part II, Section 3</p>	
<p>5.2.8 Surveillance Testing and Inspection Schedule.</p>		
<p>A surveillance testing and inspection program shall be prescribed to insure that safety-related structures, systems, and components will continue to operate, keeping parameters within normal bounds, or will act to put the plant in a safe condition if they exceed normal bounds.</p>	<p>NQA-1, Basic Requirements 10 and 11, and Supplements 10S-1 and 11S-1 QAPD, Part II, Section 11</p>	
<p>Provisions shall be made for performing required surveillance testing and inspections, including inservice inspections. Such provisions shall include the establishment of a master surveillance schedule reflecting the status of all planned in plant surveillance tests and inspections. Frequency of surveillance tests and inspections may be related to the results of reliability analyses, the frequency and type of service, or age of the item or system, as appropriate.</p>	<p>NQA-1, Supplement 10S-1, Section 8, and Basic Requirement 11 QAPD, Part II, Section 11</p>	
<p>Additional control procedures shall be instituted, as necessary, to assure timely conduct of surveillance tests and inspections and appropriate documentation, reporting, and evaluation of the results. Surveillance testing which may increase the probability of plant trips or major transients with accompanying safety concerns should be deferred to periods when such plant trips or transients have a minimum impact on safety and reliability.</p>	<p>NQA-1, Basic Requirement 11 and Supplement 11S-1</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
5.2.9 Plant Security and Visitor Control.		
<p>Procedures shall be developed to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant. Information concerning specific design features and administrative provisions of the plant security program shall be confidential and thus accorded limited distribution. The security and visitor control procedures should consider, for example, physical provisions, such as: fences and lighting; lock controls for doors, gates and compartments containing sensitive equipment; and provisions for traffic and access control. Also to be considered are administrative provisions, such as: visitor sign-in and sign-out procedures; escorts and badges for visitors; emphasis on inspection, observation and challenging of strangers by operating crews; and a program of pre-employment screening for potential employees. See American National Standard Industrial Security for Nuclear Power Plants, N18.17-1973, for guidance and provisions for security measures adequate to protect nuclear power plants. [11]</p>		<p>Administrative controls are established through the security measures required by regulation (10 CFR 73) and NRC orders. These regulatory requirements have superseded the requirements of ANSI N18.7.</p>
5.2.10 Housekeeping and Cleanliness Control.		
<p>Housekeeping practices shall be utilized recognizing requirements for the control of radiation zones and the control of work activities, conditions and environments that can affect the quality of important parts of the nuclear plant. Housekeeping encompasses all activities related to the control of cleanliness of facilities, materials, equipment fire prevention and protection including disposal of combustible material and debris and control of access to areas, protection of equipment, radioactive contamination control and storage of solid radioactive waste. Housekeeping practices shall assure that only proper materials, equipment, processes and procedures are utilized and that the quality of items is not degraded as a result of housekeeping practices or techniques.</p>	<p>NQA-1, Part II, Subpart 2.3 QAPD, Part IV</p>	
Where necessary, procedures and work instructions needed to assure	NQA-1, Part I, Basic Requirements 2 and	NQA-1, Subpart 2.3 replaces ANSI

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>compliance with specific requirements shall be available; e.g., inspection and cleaning of electrical bus and control centers, cleaning of control consoles, radioactive decontamination. Particular attention should be given to housekeeping in work and storage areas where important items are handled and stored to preclude damage or contamination. American National Standard Housekeeping During the Construction Phase of Nuclear Power Plants, N-45.2.3-1973 [12] shall be applied to those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction.</p>	<p>5; and Part II, Subparts 2.3 and 2.18 QAPD, Part II, Sections 2 and 5.</p>	<p>N45.2.3</p>
<p>During maintenance or modification activities, certain portions of safety-related systems may be subject to potential contamination with foreign materials. To prevent such contamination, control measures, including measures for access control, shall be established. Immediately prior to closure an inspection shall be conducted to assure cleanness and the result of such inspection shall be documented. American National Standard Cleaning of Fluid Systems and Associated Components during Construction Phase of Nuclear Power Plant, N45.2.1-1973 [13] shall be applied to activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction. Measures for minimizing the introduction of foreign materials during maintenance or modification, or cleaning following maintenance or modification of radioactively contaminated systems or of equipment of high radiation fields require special consideration.</p>	<p>NQA-1-1994, Part II, Subpart 2.1 and Subpart 2.18, Section 2.3</p>	<p>NQA-1, Subpart 2.1 replaces N45.2.1</p>
<p>5.2.11 Corrective Actions.</p>		
<p>The program shall provide measures to ensure that conditions adverse to plant safety, such as failure, malfunctions, deficiencies, deviations, defective material and equipment, abnormal occurrences, and nonconformances are promptly identified and corrected.</p>	<p>NQA-1, Basic Requirement 16, and Subpart 2.18 QAPD, Section 16</p>	
<p>In the case of significant conditions adverse to safety, the measures shall assure that the cause of the condition is determined and corrective action taken shall be documented and reported to appropriate levels of</p>	<p>NQA-1, Basic Requirement 16, Subpart 2.18, Section 4.3.2 QAPD, Part II, Section 16 and Part V,</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
management and for independent review in accordance with Section 4.3.	Section 2	
5.2.12. Plants Records Management.		
Provisions shall be made for preparation and retention of plant records as appropriate.	NQA-1, Basic Requirement 17 and Supplement 17S-1 QAPD, QAPD Part II, Section 17.1	
The responsibility for maintaining records and storing them at a specified location or locations shall be assigned.	NQA-1, Basic Requirement 17	
Retention periods of sufficient duration to assure the ability to reconstruct significant events and satisfy any statutory requirements which apply shall be specified.	NQA-1, Supplement 17S-1, Section 2.8 QAPD, Part II, Section 17.1	Reg. Guide 1.28, Rev. 3, Table 1 provides equivalent information to the listing contained in ANSI N45.2.9.
American National Standard Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants, N45.2.9-1974, shall be used for management of plant records during the operational phase. [14]	NQA-1 Basic Requirement 17, Supplement 17S-1 QAPD, Part II, Section 17.1	NQA-1, Supplement 17S-1 with the information in Reg. Guide 1.28, Rev. 3, is equivalent to ANSI N45.2.9
5.2.13 Procurement and Materials Control.		
Measures shall be provided for procurement, documentation and control of those materials and components including spare and replacement parts necessary for plant operation, refueling, maintenance and modification. These measures shall utilize American National Standard Quality Assurance Requirements for the Control of Procurement of Items and Services for Nuclear Power Plants, N45.2.13-1976. The Appendix to N45.2.13 is particularly useful in determining the quality assurance requirements depending on the complexity or safety of the item. [15]. Procedures shall be established and implemented to ensure that purchased materials and components associated with safety-related structures or systems are: (1) Purchased to specifications and codes equivalent to those specified for the original equipment, or those specified by a properly reviewed and approved revision. (In those cases where the original item or part is	NQA-1, Basic Requirements 4, 8, and 15; Supplements 4S-1, 8S-1, and 15S-1; and Subpart 2.2 QAPD, Part II, Sections 4, 8, and 15	NQA-1 Basic and Supplemental requirements associated with sections 4 and 7 are equivalent to the requirements of N45.2.13 and replace that standard.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>found to be commercially "off the shelf," or without specifically identified quality assurance requirements spare and replacement parts may be similarly procured but care shall be exercised to assure at least equivalent performance. In those cases where the QA requirements of the original item cannot be determined, an engineering evaluation shall be conducted by qualified individuals to establish the requirements and controls. This evaluation shall assure that interfaces, interchangeability, safety, fit and function are not adversely affected or contrary to applicable regulatory or code requirements. The results of this evaluation shall be documented);</p> <p>(2) Produced or fabricated under requirements at least equivalent to that of the original equipment, or those specified by a properly reviewed and approved revision;</p> <p>(3) Packaged and transported in a manner that will ensure that the quality is not degraded during transit;</p> <p>(4) Properly documented to show compliance with applicable specifications, codes and standards;</p> <p>(5) Properly inspected, identified and stored to protect against damage, deterioration or misuse;</p> <p>(6) Properly controlled to ensure the identification, segregation and disposition of nonconforming material. Special nuclear material and sources shall be shipped and stored as specified in the U.S. Nuclear Regulatory Commission (NRC) fuel license and other applicable regulatory documents.</p>		
5.2.13.1 Procurement Document Control.		
Measures shall be provided to assure that applicable regulatory requirements, design bases and other requirements which are necessary to assure adequate quality are included or referenced in the procedures for procurement of items and services.	NQA-1, Basic Requirement 4 and Supplement 4S-1, Section 2.2	
To the extent necessary, procurement documents shall require suppliers to provide a quality assurance program consistent with the pertinent	NQA-1, Basic Requirement 4 and Supplement 4S-1, Section 2.3	The QA requirements of NQA-1-1994 are equivalent to those of ANSI

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
requirements of American National Standard Quality Assurance Program Requirements for Nuclear Power Plants, N45.2-1971. [2]		N45.2-1971.
Where changes are made to procurement documents, they shall be subject to the same degree of control as was used in the preparation of the original documents.	NQA-1, Supplement 4S-1, Section 4	
Procurement documents shall include provisions for the following, as applicable: (1) Supplier Quality Assurance Program. Identification of quality assurance requirements applicable to the items or services procured.	NQA-1, Supplement 4S-1, Section 2.3	
(2) Basic Technical Requirements. Where specific technical requirements apply, such as drawings, specifications, and industrial codes and standards, they shall be identified by titles and dates of issue in such a way as to clearly set forth the applicable documents. Where procedural requirements apply, in such areas as test and inspection needs, fabrication, cleaning, erecting, packaging, handling, shipping and storage, they too, shall be identified clearly and in such a way as to avoid uncertainty as to source and need.	NQA-1, Supplement 4S-1, Section 2.2	
(3) Source Inspection and Audit. Provisions for access to the supplier's facilities and records for source inspection and audit when the need for such inspection or audit has been determined.	NQA-1, Supplement 4S-1, Section 2.4	
(4) Documentation Requirements. Records to be prepared, maintained, submitted or made available for review, such as drawings, specifications, procedures, procurement documents, inspection and test records, personnel and procedure qualifications, and material, chemical, and physical test results. Instruction on record retention and disposition shall be provided.	NQA-1, Supplement 4S-1, Section 2.5	
(5) Lower Tier Procurement. Provisions for extending applicable requirements to lower tier subcontractors and suppliers, including purchaser's access to facilities and records.	NQA-1, Supplement 4S-1, Sections 2.3 and 2.4	
5.2.13.2 Control of Purchased Material, Equipment and Services.		

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
Measures shall be provided to assure that purchased items and services, whether purchased directly or through contractors, conform to the procurement documents.	NQA-1, Basic Requirement 7	
These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor, inspection and audit at the source and examination of items upon delivery.	NQA-1, Basic Requirement 7	
Measures for evaluation and selection of procurement sources include the use of historical quality performance data, source surveys or audits, or source qualification programs.	NQA-1, Supplement 7S-1, Section 3.1	
Source inspection or audit shall be performed as necessary to assure the required quality of an item. Source inspection or audit may not be necessary when the quality of the item can be verified by review of test reports, inspection upon receipt, or other means.	NQA-1, Supplement 7S-1, Section 3.1 and Section 8 QAPD, Part II, Section 7.1	
Where required by code, regulation, or contract requirements documentary evidence that items conform to procurement requirements shall be available at the nuclear power plant site prior to installation or use of such items.	NQA-1, Supplement 7S-1, Section 8.1	
This documentary evidence shall be retrievable and shall be sufficient to identify the specific requirements such as codes, standards and specifications met by the purchased item.	NQA-1, Supplement 7S-1, Section 5.2 and Section 6	
Where not precluded by other requirements, such documentary evidence may take the form of written certifications of conformance which identify the requirements met by the items, provided means are available to verify the validity of such certifications.	NQA-1, Supplement 7S-1, Section 8.2	
The effectiveness of the control of quality shall be assessed by the purchaser at intervals consistent with the importance, complexity and quality of the item or service.	NQA-1, Supplement 7S-1, Section 5 QAPD, Part II, Section 7.1	
5.2.13.3 Identification and Control of Materials, Parts and Components.		

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
Measures shall be provided for the identification and control of materials, parts, and components including partially fabricated subassemblies.	NQA-1, Basic Requirement 8 and Supplement 8S-1	
These procedures shall be implemented to provide insurance that only correct and accepted items are used and installed, and relating an item of production (batch, lot, component, part) at any stage, from initial receipt through fabrication, installation, repair or modification, to an applicable drawing, specification, or other pertinent technical document.	NQA-1, Supplement 8S-1, Section 2.1	
Physical identification shall be used to the maximum extent possible. Where physical identification is either impractical or insufficient, physical separation, procedural control or other appropriate means shall be employed.	NQA-1, Supplement 8S-1, Section 2.2	
Identification may be either on the item or on records traceable to the item, as appropriate.	NQA-1, Basic Requirement 8	
Where identification marking is employed, the marking shall be clear, unambiguous and indelible, and shall be applied in such a manner as not to affect the function of the item.	NQA-1, Supplement 8S-1, Section 2.3	
Markings shall be transferred to each part of an item when subdivided and shall not be obliterated or hidden by surface treatment or coatings unless other means of identification are substituted.	NQA-1, Supplement 8S-1, Section 2.3	
When codes, standards or specifications require traceability of materials, parts or components to specific inspection or test records, the program shall be designed to provide such traceability.	NQA-1, Supplement 8S-1, Section 3.1	
5.2.13.4 Handling, Storage and Shipping.		
Measures shall be provided to control handling, storage and shipping, including cleaning, packaging and preservation of material and equipment in accordance with established instructions, procedures or drawings, to prevent damage, deterioration and loss. When necessary for particular items, special coverings, special equipment and special protective environments, such as inert gas atmosphere, specific moisture content levels and temperature levels shall be specified, provided, and	NQA-1, Basic Requirement 13, Supplement 13S-1, Section 2	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
their existence verified.		
When necessary for particular items, special coverings, special equipment and special protective environments, such as inert gas atmosphere, specific moisture content levels and temperature levels shall be specified, provided, and their existence verified.	NQA-1, Supplement 13S-1, Section 3.1	
For critical, sensitive, perishable or high value articles, specific written procedures for handling, storage, packaging, shipping and preservation should be used.	NQA-1, Supplement 13S-1, Section 3.2	
<p>Special handling tools and equipment <u>should</u> be provided and controlled as necessary to ensure safe and adequate handling.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.e.</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>e. Section 5.2.13.4–The guideline concerning special handling tools and equipment.</p> <p>[NOTE: The affected "should" word is underlined in the N18.7 excerpt above.]</p>	NQA-1, Supplement 13S-1, Section 3.3	
Special handling tools and equipment shall be inspected and tested in accordance with written procedures and at specified times, to verify that the tools and equipment are adequately maintained.	NQA-1, Supplement 13S-1, Section 3.3	
Attention shall be given to providing adequate instructions for marking and labeling of items for packaging, shipment and storage. Marking shall be adequate to identify, maintain and preserve the shipment, including indication of the presence of special environments or the need for special control.	NQA-1, Supplement 13S-1, Section 4	
American National Standard for Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase), N45.2.2-1972, shall be applied to those activities	NQA-1, Part II, Subpart 2.2	NQA-1, Subpart 2.2 is equivalent to the cited ANSI N45.2.2 standard.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction. [16]		
5.2.14 Nonconforming Items.		
Measures shall be provided to control items, services or activities which do not conform to requirements (see also Section 5.2.6).	NQA-1, Basic Requirement 15	
These procedures shall include as appropriate, instructions for identification, documentation, segregation, disposition and notification to affected organizations.	NQA-1, Basic Requirement 15, and Subpart 2.18, Section 4	
Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures.	NQA-1, Supplement 15S-1, Section 4.1	
The responsibility and authority for the disposition of nonconforming items shall be defined.	NQA-1, Supplement 15S-1, Section 4.2	
Repaired and reworked items shall be reinspected in accordance with applicable procedures.	NQA-1, Supplement 15S-1, Section 4.5	
Measures which control further processing, delivery or installation of a nonconforming or defective item pending a decision on its disposition shall be established and maintained. Nonconforming items may be disposed of by acceptance "as is," by scrapping or repairing the defective item, or by rework to complete or correct to a drawing or specification. Such measures shall provide assurance that the item is identified as nonconforming and controlled. The measures shall require documentation verifying the acceptability of nonconforming items which have the disposition of "repair" or "use as is." A description of the change, waiver or deviation that has been accepted shall be documented to record the change and denote the as-built condition.	NQA-1, Supplement 15S-1, Sections 2 and 4	
As a guideline, control of nonconforming items by tagging, marking or other means of identification is acceptable where physical segregation is not practical, although physical segregation and marking are preferred.	NQA-1, Supplement 15S-1, Section 3	
5.2.15 Review, Approval and Control of Procedures.		

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>The administrative controls and quality assurance program shall provide measures to control and coordinate the approval and issuance of documents, including changes thereto, which prescribe all activities affecting quality. Such documents include those which describe organizational interfaces, or which prescribe activities affecting safety-related structures, systems, or components. These documents also include operating and special orders, operating procedures, test procedures, equipment control procedures, maintenance or modification procedures, refueling, and material control procedures.</p>	<p>NQA-1, Basic Requirement 6 and Supplement 6S-1 QAPD, Part II, Section 6</p>	
<p>These measures shall assure that documents, including revisions or changes, are reviewed for adequacy by appropriately qualified personnel and approved for release by authorized personnel; and are distributed in accordance with current distribution lists and used by the personnel performing the prescribed activity, and that procedures are provided to avoid the misuse of outdated or inappropriate documents.</p> <p>Procedures for operational phase activities of a nuclear power plant reflect the conditions that exist at the time the procedures are written. These conditions include the technical information available, industry experience, and in the case of the initial procedures for a new plant, assumptions made regarding the detailed behavior of the plant that may not be fully known prior to operation. In order to ensure that the procedures in current use provide the best possible instructions for performance of the work involved, systematic review and feedback of information based on use is required.</p> <p>Each procedure shall be reviewed and approved prior to initial use. The frequency of subsequent reviews shall be specified and may vary depending on the type and complexity of the activity involved, and may vary with time as a given plant reaches operational maturity. Applicable procedures shall be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction. Applicable procedures shall be reviewed following any modification to a system.</p>	<p>NQA-1, Basic Requirement 6 and Supplement 6S-1 QAPD, Part II, Section 6</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. A revision of a procedure constitutes a procedure review.</p> <p>Procedures shall be approved as designated by the owner organization before initial use. Rules shall be established which clearly delineate the review of procedures by knowledgeable personnel other than the originator and the approval of procedures and procedure changes by authorized individuals.</p>		
<p>Changes to documents shall be reviewed and approved by the same organizations that perform the original review and approval unless the owner organization designates another qualified organization.</p>	NQA-1, Supplement 6S-1, Section 3.1	
<p>The reviewing organizations shall have access to pertinent background information upon which to base its approval and shall have adequate understanding of requirements and intent of the original document.</p>	NQA-1, Supplement 6S-1, Section 3.1	
<p>Those participating in any activity shall be made aware of, and use, proper and current instructions, procedures, drawings, and engineering requirements for performing the activity. Participating organizations shall have procedures for control of the document and changes thereto to preclude the possibility or use of outdated or inappropriate documents.</p>	QAPD, Part II, Section 6.1	
<p>Document control measures shall provide for:</p> <ol style="list-style-type: none"> (1) Identification of individuals or organizations responsible for preparing, reviewing, approving, and issuing documents and revisions thereto (2) Identifying the proper documents to be used in performing the activity (3) Coordination and control of interface documents (4) Ascertaining that proper documents are being used (5) Establishing current and updated distribution lists 	NQA-1, Supplement 6S-1, Section 2 QAPD, Part II, Section 6	
<p>5.2.16 Measuring and Test Equipment.</p>		
<p>The method and interval of calibration for each installed instrument and control device shall be defined and shall be based on the type of</p>	NQA-1, Basic Requirement 12,	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2-Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
equipment, stability and reliability characteristics, required accuracies and other conditions affecting calibration.	Supplement 12S-1	
Tools, instruments, testing equipment and measuring devices used for measurements, tests and calibration shall be of the proper range and type and shall be controlled, calibrated and adjusted and maintained at specified intervals or prior to use to assure the necessary accuracy of calibrated devices.	NQA-1, Basic Requirement 12, Supplement 12S-1, Sections 2 and 3	
When calibration, testing, or other measuring devices are found to be out of calibration, an evaluation shall be made and documented concerning the validity of previous test and the acceptability of devices previously tested from the time of the previous calibration.	NQA-1, Supplement 12S-1, Section 3.2	
If any calibration, testing or measuring device is consistently found to be out of calibration, it shall be repaired or replaced.	NQA-1, Supplement 12S-1, Section 3.2	
It is not the intent of this Standard to imply a need for special calibration and control measures on rulers, tape measures, levels and other such devices if normal commercial practices provide adequate accuracy.	NQA-1, Supplement 12S-1, Section 3.3	
Special calibration shall be performed when the accuracy of either installed or calibrating equipment is questionable.	NQA-1, Supplement 12S-1, Section 3.2	
Records shall be made and equipment suitably marked to indicate calibration status.	NQA-1, Supplement 12S-1, Section 5	
American National Standard N45.2.4-1972 shall be applied to those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction. [6]	NQA-1, Subpart 2.4	NQA-1-1994, Subpart 2.4 (ANSI/IEEE Std. 336-1985 IEEE) is equivalent to ANSI N45.2.4. NQA-1-1994, Subpart 2.16 consists of IEEE Std. 498-1985; however, IEEE has withdrawn this standard. The primary requirements from this standard are included in NQA-1-1994, Basic Requirement 12 and Supplement 12S-1.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
5.2.17 Inspections.		
A program for inspection of activities affecting safety shall be established and executed by or for the organization performing the activity to verify conformance with applicable documented instructions, procedures, and drawings.	NQA-1, Basic Requirement 10 and Supplement 10S-1 establish program requirements. QAPD, Part II, Section 10	
Inspections, examinations, measurements, or tests of material, products, or activities shall be performed for each work operation where necessary to assure quality.	NQA-1, Subparts 2.1, 2.2, 2.3, 2.4, 2.5, 2.8, and 2.15 establish specific inspections to be performed.	
Such inspections shall be performed by qualified individuals other than those who performed or directly supervised the activity being inspected. Inspection of operating activities (work functions associated with normal operation of the plant, routine maintenance, and certain technical services routinely assigned to the onsite operating organization) may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. These independent inspections, i.e., those performed by individuals not assigned first-line supervisory responsibility for the conduct of the work, are not intended to dilute or replace the clear responsibility of first-line supervisors for the quality of work performed under their supervision.	NQA-1 Basic Requirement 10, and Supplement 10S-1 QAPD, Part II, Section 10	
For modifications and nonroutine maintenance, inspections shall be conducted in a manner similar (frequency, type, and personnel performing such inspections) to that associated with construction phase activities (see also Section 5.2.7).	NQA-1, Supplement 10S-1, Section 7.4	
Inspections of safety-related activities shall be performed in accordance with approved written procedures, which set forth the requirements and acceptance limits and specify the inspection responsibilities.	NQA-1, Basic Requirement 10, and Supplement 10S-1, Section 2	
If mandatory inspection hold points are required, the specific hold points shall be indicated in appropriate documents.	NQA-1, Supplement 10S-1, Section 4	
Information concerning inspection shall be obtained from the related	NQA-1, Supplement 10S-1, Section 2	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
design drawings, specifications and/or other controlled documents.		
When inspection techniques require specialized qualifications or skills, personnel performing the inspection shall meet applicable licensing requirements, codes, and standards appropriate to the discipline involved (see also Sections 5.2.7, 5.2.6 and 5.3.10).	NQA-1, Supplement 10S-1, Section 3.2; Supplements 2S-1 and 2S-2	
If inspection is impossible or disadvantageous, indirect control by monitoring processing methods, equipment and personnel shall be provided.	NQA-1, Supplement 10S-1, Section 6.1	
Both inspection and process monitoring shall be provided when control is inadequate without both. In cases where documented verification of quality implied by the above requirements is not possible or feasible, the extent of inspection or performance testing to verify adequacy of structures, systems, or components for service should be, in general, greater than otherwise required.	NQA-1, Supplement 10S-1, Section 6.1	
The owner organization shall evaluate inspection results along with test results (see Section 5.2.19) to determine whether the individual inspection and test programs demonstrate that the plant can be operated safely and as designed.	NQA-1, Supplement 10S-1, Basic Requirement 11 and Supplement 11S-1, and Subpart 2.18, Section 2.2	
Records shall be kept in sufficient detail to permit adequate confirmation of the inspection program. The person recording the data as well as the person approving the inspection results shall be identified. Deviations, their cause, and any corrective action completed or planned as a result of the deviations shall be documented. Inspection records shall be identified as such and shall be retrievable (see also Section 5.2.12).	NQA-1, Supplement 10S-1, Section 9 and Supplement 11S-1 Section 5	Inspection records under NQA-1 may be a part of the work documents.
5.2.18 Control of Special Processes.		
Measures shall be established and documented to assure that special processes, accomplished under controlled conditions in accordance with applicable codes, standards, specifications, criteria, and other special requirements, use qualified personnel and procedures.	NQA-1, Basic Requirement 9 and Supplement 9S-1, Section 2	
Qualification of personnel, procedures, and equipment shall comply with	NQA-1, Supplement 9S-1, Section 3.1.1	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
the requirements of applicable codes and standards.		
Special processes are those that require interim in process controls in addition to final inspection to assure quality including such processes as welding, heat treating, chemical cleaning, and nondestructive examination.	NQA-1, Basic Requirement 9 QAPD, Part II, Section 9	
For special processes not covered by existing codes or standards, or where item quality requirements exceed the requirements of established codes or standards, the necessary qualifications of personnel, procedures, or equipment shall be defined.	NQA-1, Supplement 9S-1, Section 3.4	
5.2.19 Test Control.		
A test program shall be established to assure that testing required to demonstrate that the item will perform satisfactorily in service is identified and documented, and that the testing is performed in accordance with written test procedures which incorporate or reference the requirements and acceptance limits contained in applicable design documents.	NQA-1, Basic Requirement 11, Supplements 11S-1 and 11S-2, and Subpart 2.18 establish programmatic controls for testing. NQA-1, Subparts 2.1, 2.4, 2.5, and 2.8 establish specific testing requirements that apply to the operational phase.	
The test program shall cover all required tests including: (1) Tests during the preoperational period to demonstrate that performance of plant systems is in accordance with design intent and that the coordinated operation of the plant as a whole is satisfactory, to the extent feasible. (2) Tests during the initial operational phase to demonstrate the performance of systems that could not be tested prior to operation and to confirm those physical parameters, hydraulic or mechanical characteristics that need to be known, but which could not be predicted with the required accuracy, and to confirm that plant behavior conforms to design criteria. The initial start-up test program shall be planned to permit safe fuel loading and start-up; to increase power in safe increments; and to perform major testing at specified power plateaus. If tests require the variation of operating parameters outside of their normal	NQA-1, Supplement 10S-1, Section 8; Supplement 11S-1, Section 2; Subpart 2.4, Section 7; Subpart 2.8, Section 5; and Subpart 2.18, Section 2.7 QAPD, Part II, Section 11	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2: Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>range, the limits within which such variation is permitted shall be prescribed. Prerequisites and record keeping shall be given attention and the scope of the testing shall demonstrate insofar as practicable that the plant is capable of withstanding the design transients and accidents. The suitability of plant operating procedures <u>should</u> be checked to the maximum extent possible during the preoperational and initial start-up test programs.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.f.</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>f. Section 5.2.19(2)–The guideline for checking plant operating procedures during the testing program.</p> <p>[NOTE: The affected "should" word is underlined in the N18.7 excerpt above.]</p> <p>(3) Surveillance tests during the operational phase to provide assurance that failures or substandard performance do not remain undetected and that the required reliability of safety-related systems is maintained (see Section 5.2.8).</p> <p>(4) Tests during design, fabrication and construction activities associated with plant maintenance and modifications during the operational phase and the demonstration of satisfactory performance following plant maintenance and modifications or procedural changes (see Section 5.2.7).</p>		
5.2.19.1 Preoperational Tests.		
<p>Preoperational tests are generally performed sequentially in accordance with written procedures.</p> <p>Procedures <u>should</u> ensure that prerequisite steps for equipment testing, such as completion of necessary construction, prior testing, safety precautions, and measures to preserve equipment status have been or</p>	<p>NQA-1, Supplement 11S-1, Section 3; Subpart 2.4, Section 7; Subpart 2.8, Section 5</p> <p>QAPD, Part II, Section 11</p>	<p>NQA-1, Subpart 2.8 is equivalent to the requirements of ANSI N45.2.8</p>

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>will be performed (see also Sections 5.2.17 and 5.3.10).</p> <p>A detailed prescribed physical inspection of equipment components and facilities <u>should</u> be performed to ensure readiness for operation. Typical items to be covered include cleanliness, lubrication, setting of limit switches, calibration of instruments and presence of safety devices. The test procedure <u>should</u> list the checks to be made and include acceptance criteria and reference sources, such as vendor's literature, engineering drawings or plant specifications.</p> <p>A component test is a functional, operational or performance test of an individual piece of equipment or unit system under prescribed conditions. Typical parameters to be examined are direction of rotation, bearing temperatures, vibration, time delays, and ability to operate with remote and local controls. The procedure <u>should</u> list checks to be made and provide acceptance criteria. Consideration should also be given to providing a run-in period to minimize early failures during operation of the plant.</p> <p>Individual system tests establish the functional adequacy by operation under prescribed conditions. The tests shall be designed to permit evaluation of system performance including, for example, the measurement of flow, temperature, pressure, response time and vibration, transfer of power supply to emergency power and accuracy and response of control devices.</p> <p>The preoperational testing program <u>should</u> demonstrate, as nearly as can be practicably simulated, the overall integrated operation of the plant systems at rated conditions, including simultaneous operation of auxiliary systems. It may be necessary to defer portions of these tests until nuclear heat is available.</p> <p>The procedures used <u>should</u> be similar to those discussed in 5.3.3 and 5.3.4, and they <u>should</u> be modified to require variation in control parameters, such as pump stops and restarts, cycling valves and varying flows so that system performance can be evaluated. For additional requirements in matters relating to preoperational test programs,</p>		

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>American National Standard N45.2.8-1975 is generally applicable. [8] Reg. Guide 1.33 – C. Regulatory Position 5.g. The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p style="padding-left: 20px;">g. Section 5.2.19.1—The guidelines for preoperational tests, except the guideline that refers to a run-in period for equipment. In addition to these guidelines, the prerequisite steps for each equipment test should be completed prior to the commencement of the preoperational test.</p> <p>[NOTE: The affected "should" words are underlined in the N18.7 excerpt above.]</p>		
<p>5.2.19.2 Tests Prior to and During initial Plant Operation.</p>		
<p>Prior to placing a nuclear power plant into operation, a preoperational test program shall be performed to demonstrate the functional adequacy of plant components, systems and structures. Following fuel loading an initial start-up test program shall be conducted to evaluate plant performance as the start-up progresses.</p>	<p>NQA-1, Basic Requirement 11, and Subpart 2.8, Section 5 QAPD, Part II, Section 11</p>	
<p>Responsibilities</p>		
<p>The ultimate responsibility for the preparation and execution of adequate preoperational and initial start-up test programs rests with the owner organization. If design or construction is performed by other than the owner organization, design organizations involved should participate in definition of the programs, and the construction organization involved may supply manpower or supervision for execution of part or all of the program, but the owner organization shall determine that the program is adequate and that the results are satisfactory.</p>	<p>QAPD, Part II, Section 1</p>	
<p>Scheduling</p>		
<p>A schedule shall be provided and maintained to provide assurance that</p>	<p>QAPD, Part II, Section 11</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
all necessary tests are performed and properly evaluated on a timely basis. Testing shall be scheduled so that the safety of the plant is never dependent on the performance of an untested system (see also Section 5.2.8).		
5.2.19.3 Tests Associated with Plant Maintenance, Modifications or Procedure Changes.		
Tests shall be performed following plant modifications or significant changes in operating procedures to confirm that the modifications or changes reasonably produce expected results and that the change does not reduce safety of operations.	NQA-1, Supplement 11S-1, Section 2 and Subpart 2.18, Section 2 QAPD, Part II, Section 11	
5.3 Preparation of Instructions and Procedures.		
<p>The administrative controls and quality assurance program shall be carried out throughout plant life in accordance with written procedures. Activities affecting safety at nuclear power plants shall be described by written procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures. Reg. Guide 1.33 – Regulatory Position C, Item 1</p> <p>ANSI N18.7-1976/ANS-3.2 requires the preparation of many procedures to carry out an effective quality assurance program. Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," to this regulatory guide should be used as guidance to ensure minimum procedural coverage for plant operating activities, including related maintenance activities. Appendix A lists typical safety-related activities that should be covered by written procedures but does not provide a complete listing of needed procedures. Many other activities carried out during the operation phase of a nuclear power plant require written procedures not included in Appendix A. Appendix A may also contain procedures that are not applicable to an applicant because of the configuration of the nuclear power plant. The procedures listed in Appendix A may be combined, separated, or deleted to conform to the applicant's procedures plan.</p>	NQA-1, Basic Requirement 5 QAPD, Part II, Section 5; Part V, Section 3	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
These procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. These procedures shall provide an approved preplanned method of conducting operations. Procedures shall be prepared and approved prior to implementation as required by 4.3 and 5.2.15.	NQA-1, Basic Requirement 5	
5.3.1 Procedure Scope.		
Each procedure shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision, but need not provide a complete description of the system or plant process.	QAPD, Part V, Section 3	
5.3.2 Procedure Content.		
The format of procedures may vary from plant to plant, depending on the policies of the owner organization. However, procedures shall include, as appropriate, the following elements:	QAPD, Part V, Section 3	
(1) Title. Each procedure <u>should</u> contain a title descriptive of the work or system or unit to which it applies, a revision number or date, and an approval status.	QAPD, Part V, Section 3.1	
(2) Statement of Applicability. The purpose for which the procedure is intended should be clearly stated; for example, for use during reactor or plant start-up. If the purpose is not clear from the title, a separate statement of applicability should be provided, which may identify the reasons for particular operations.	QAPD, Part V, Section 3.1	
(3) References. References, including reference to technical specifications, should be included in procedures as applicable. References should be identified within the body of procedures when the sequence of steps requires other tasks to be performed prior to or concurrent with a particular step within that task.	NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.2 QAPD, Part V, Section 3.1	
(4) Prerequisites. Each procedure <u>should</u> identify those independent actions or procedures which shall be completed and plant conditions which shall exist prior to its use. Prerequisites applicable only to certain	NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.2	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
sections of a procedure <u>should</u> be so identified.	QAPD, Part V, Section 3.1	
(5) Precautions. Precautions <u>should</u> be established to alert the individual performing the task to those important measures which <u>should</u> be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation. It may be convenient to specify precautions separately. Cautionary notes applicable to specific steps in the procedure <u>should</u> be included in the main body of the procedure and <u>should</u> be identified as such.	NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.2 QAPD, Part V, Section 3.1	
(6) Limitations and Actions. Limitations on the parameters being controlled and appropriate corrective measures to return the parameter to the normal control band <u>should</u> be specified. It may be convenient to specify limitations and setpoints in a separate section. Where appropriate, quantitative control guides should be provided; for example, an appropriate step of a procedure should say "Manually adjust the feedwater flow controller to maintain the reactor water level at x feet," rather than "Manually adjust the feedwater flow to maintain water level."	QAPD, Section 5 QAPD, Part V, Section 3.1	
(7) Main Body. The main body of a procedure <u>should</u> contain step-by-step instructions in the degree of detail necessary for performing a required function or task.	NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.2 QAPD, Part V, Section 3.1	
(8) Acceptance Criteria. Procedures <u>should</u> contain, where applicable, acceptance criteria against which the success or failure of test-type activity would be judged. In some cases there would be qualitative criteria, i.e., a given event does or does not occur. In other cases quantitative values would be designated.	NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.2 QAPD, Part V, Section 3.1	
(9) Checkoff Lists. Complex procedures <u>should</u> have checkoff lists. These lists may be included as part of the procedure or may be appended to the procedure. Reg. Guide 1.33 – C. Regulatory Position 5.h. The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the	NQA-1, Introduction to Part II, and Subpart 2.18, Section 2.2 QAPD, Part V, Section 3.1	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>verb "shall") of the standard:</p> <p>h. Section 5.3.2-The guidelines that describe the content (excluding format) of procedures, except for the guidelines that address (1) a separate statement of applicability in Section 5.3.2(2), (2) inclusion of references in procedures, as applicable, in Section 5.3.2(3), and (3) inclusion of quantitative control guides in Section 5.3.2(6).</p> <p>[NOTE: The affected "should" words are underlined in the N18.7 excerpts above.]</p>		
<p>5.3.3 System Procedures.</p>		
<p>Instructions for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation and other instructions appropriate for operations of systems related to the safety of the plant shall be delineated in system procedures. Procedures for correcting off-normal conditions shall be developed for those events where system complexity may lead to operator uncertainty. System procedures shall contain checkoff lists where appropriate.</p>	<p>QAPD, Part V, Section 3.2</p>	
<p>5.3.4 General Plant Procedures.</p>		
<p>General plant procedures provide instructions for the integrated operations of the plant. In addition to the characteristics of procedures presented in 5.3.1 and 5.3.2, details concerning specific general plant procedures are emphasized in the following sections.</p>	<p>QAPD, Part V, Section 3.2</p>	
<p>5.3.4.1 Start-up Procedures.</p>		
<p>Start-up procedures shall be provided that include starting the reactor from cold or hot conditions and establishing power operation, with the generator synchronized to the line. Recovery from reactor trips shall be in accordance with the start-up procedure and shall be subject to the determinations set forth in 5.2.1.</p> <p>(1) Prerequisites. Start-up procedures shall include provisions for documented determination that prerequisites have been met, including confirmation that necessary instruments are operable and properly set;</p>	<p>QAPD, Part V, Section 3.2</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>valves are properly aligned; necessary systems procedures, tests and calibrations have been completed; and required approvals have been obtained. Checkoff lists are normally used for this purpose.</p> <p>(2) Main Body. The main body of the start-up procedures shall include the major steps of the start-up sequence, including reference to appropriate system procedures. Such major steps shall include or reference detailed instructions for their performance, for example, minimum instrumentation requirements coverage of control rod withdrawal sequence or soluble poison dilution, manipulation of controls, establishment of feed and steam flow and turbine start-up and synchronization. Checkoff lists should be used for the purpose of confirming completion of major steps in proper sequence.</p>		
5.3.4.2 Shutdown Procedures.		
<p>Shutdown procedures shall be provided to guide operations during and following controlled shutdown or reactor trips and shall include instructions for establishing or maintaining hot standby or cold shutdown conditions, as applicable. The major steps involved in shutting down the plant shall be specified, including detailed instructions for the performance of such actions as monitoring and controlling reactivity, load reduction and cooldown rates, sequence of activating or deactivating equipment, requirements for prompt analyses of causes of reactor trips or abnormal conditions requiring unplanned controlled shutdowns, and provisions for decay heat removal. Checkoff lists should be used for the purpose of confirming completion of major steps in proper sequence.</p>	QAPD, Part V, Section 3.2	
5.3.4.3 Power Operation and Load Changing Procedures.		
<p>Procedures for steady-state power operation and load changing shall be provided that include, for example, provisions for use of control rods, chemical shim, coolant flow control or any other system available for long-or-short term control of reactivity, making deliberate load changes, responding to unanticipated load changes and adjusting operating parameters.</p>	QAPD, Part V, Section 3.2	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
5.3.4.4 Process Monitoring Procedures.		
<p>Procedures for monitoring performance of plant systems shall be required to assure that core thermal margins and coolant quality are maintained at all times, that integrity of fission product barriers is maintained at all times and that engineered safety features and emergency equipment are in a state of readiness to maintain the plant in a safe condition if needed. The limits (maximum and minimum) for significant process parameters shall be identified. The nature and frequency of this monitoring shall be covered by operating procedures, as appropriate.</p>	QAPD, Part V, Section 3.2	
5.3.4.5 Fuel-Handling Procedures.		
<p>Fuel-handling operations shall be performed in accordance with written procedures. These procedures shall specify actions for core alterations, accountability of fuel and partial or complete refueling operations that include, for example, continuous monitoring of the neutron flux throughout core loading, periodic recording of data, audible annunciation of abnormal flux increases and evaluation of core neutron multiplication to verify the safety of loading increments.</p> <p>Provisions shall be made for preparing specific procedures for each refueling outage and for receipt and shipment of fuel. Plant procedures should, nonetheless, prescribe the general preplanning for the fuel-handling program and its associated safety measures and should identify those aspects of the program for which procedures are to be prepared for each refueling outage.</p> <p>(1) Prerequisites. Prerequisites shall be provided in the fuel-handling procedures that include, for example, the status of plant systems required for refueling; inspection of replacement fuel, control rods, poison curtains and internals; designation of proper tools; proper conditions for spent fuel movement; proper conditions for fuel cask loading and movement; and status of interlocks, reactor trip circuits and mode switches.</p>	QAPD, Part V, Section 3.2	

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American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>(2) Main Body. The main body of fuel handling procedures shall include requirements for refueling; for example, the status of the core, instructions for proper sequence, orientation, and seating of fuel and components, rules for minimum operable instrumentation, actions to be followed in the event of fuel damage, rules for periods when refueling is interrupted, verification of the shutdown margin and the frequency of determination, communications between control room and the fuel loading station, independent verification of fuel and component location, criteria for stopping refueling and for reducing the size of the fuel loading increment, and a containment evacuation plan and its associated safety measures. Documentation of final fuel and component serial numbers and locations shall be maintained.</p>		
<p>5.3.5 Maintenance Procedures.</p>		
<p>Maintenance procedures shall contain applicable items listed under 5.3.2 and, in addition, measures to cover the features of maintenance described below.</p> <p>(1) Preparation for Maintenance. Maintenance procedures shall reflect considerations listed under 5.2.6. Adherence to applicable radiation protection measures shall be prescribed. These measures shall specify protective clothing and radiation monitoring needed to assure safety.</p> <p>(2) Performance of Maintenance. The procedures shall contain enough detail to permit the maintenance work to be performed correctly and safely, and shall include provisions for conducting and recording results of required tests and inspections. References should be made to vendor manuals, plant procedures, drawings and other sources as applicable.</p> <p>(3) Post Maintenance Check Out and Return to Service. Instructions shall be included, or referenced, for returning the equipment to its normal operating status.</p> <p>(4) Supporting Maintenance Documents. Where appropriate sections of related documents, such as vendor manuals, equipment operating and maintenance instructions, or approved drawings with acceptance criteria provide adequate instructions to assure the required quality of work, the</p>	<p>NQA-1, Subpart 2.18, Section 2 QAPD, Part V, Section 3.2</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
applicable sections of the related documents shall be referenced in the procedure, or may, in some cases, constitute adequate procedures in themselves. Such procedures shall receive the same level of review and approval as operating procedures.		
5.3.6 Radiation Control Procedures.		
Procedures shall be provided for implementation of a radiation control program to meet applicable program requirements. The radiation control program involves the acquisition of data and provision of equipment to perform necessary radiation surveys, measurements and evaluations for the assessment and control of radiation hazards associated with a nuclear power plant. Procedures shall be developed and implemented for: monitoring both external and internal exposures of employees, utilizing accepted techniques; routine radiation surveys of work areas; environmental monitoring in the vicinity of the plant; radiation monitoring of maintenance and special work activities; and for maintaining records demonstrating the adequacy of measures taken to control radiation exposures of employees and others.	QAPD, Part V, Section 3.2	
5.3.7 Calibration and Test Procedures.		
Procedures shall be provided for periodic calibration and testing of safety-related instrumentation and control systems. Procedures shall also be provided for periodic calibration of measuring and test equipment used in activities affecting the quality of these systems. The procedures shall provide for meeting surveillance schedules and for assuring measurement accuracy adequate to keep safety-related parameters within operational and safety limits.	QAPD, Part V, Section 3.2	
5.3.8 Chemical-Radiochemical Control Procedures.		
Procedures shall be provided for chemical and radiochemical control activities. They should include, for example, the nature and frequency of sampling and analyses; instructions for maintaining coolant quality within prescribed limits; and limitations on concentrations of agents that could cause corrosive attack, foul heat transfer surfaces or become sources of	QAPD, Part V, Section 3.2	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
radiation hazards due to activation. Procedures shall also be provided for the control, treatment and management of radioactive wastes and control of radioactive calibration sources.		
5.3.9 Emergency Procedures.		
<p>Procedures shall be provided to guide operations during potential emergencies. They shall be written so that a trained operator will know in advance the expected course of events that will identify an emergency and the immediate action he should take. Since emergencies may not follow anticipated patterns, the procedures should provide sufficient flexibility to accommodate variations.</p> <p>Emergency procedures that cover actions for manipulations of controls to prevent accidents or lessen their consequences should be based on a general sequence of observations and actions. Emphasis <u>should</u> be placed on operator responses to observations and indications in the control room; that is, when immediate operator actions are required to prevent or mitigate the consequences of a serious condition, procedures <u>should</u> require that those actions be implemented promptly. The emergency procedure format given in 5.3.9.1 provides a basis for coping with emergencies and is an acceptable format for prescribing operator observations and actions.</p> <p>Emergency procedures may contain supplemental background information to further aid operators in taking proper emergency actions, but this information shall be separated from the procedural actions. It is extremely difficult to distinguish between procedures prepared for the purpose of correcting off-normal conditions which in themselves do not constitute actual emergency situations, but which conceivably can degenerate into true emergencies in the absence of positive corrective action, and procedures required for coping with true emergencies that have already occurred. Some owner organizations choose the term "Off-normal Procedures" for the same purpose that others choose "Emergency Procedures." When initially available intelligence provided to operating personnel via instrument readings, physical conditions, and</p>	QAPD, Part V, Section 3.2	Requirements for Emergency Procedures have been updated through the years through industry initiatives and lessons learned.

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>personal observations may not clearly indicate the difference between a simple operational problem and a serious emergency, the actions outlined in the emergency procedures shall be based on a conservative course of action by the operating crew. Considerable judgment on the part of competent personnel is required before departing from the emergency procedure.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.i.</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>i. Section 5.3.9–The guideline concerning emergency procedures requiring prompt implementation of immediate operator actions when required to prevent or mitigate the consequences of a serious condition.</p> <p>[NOTE: The affected "should" words are underlined in the N18.7 excerpt above.]</p>		
<p>5.3.9.1 Emergency Procedure Format and Content.</p>		
<p>Emergency procedures shall include, as appropriate, the following elements:</p> <p>(1) Title. The title <u>should</u> be descriptive of the emergency for which the procedure is provided.</p> <p>(2) Symptoms. Symptoms <u>should</u> be included to aid in the identification of the emergency. They should include alarms, operating conditions and probable magnitudes of parameter changes. If a condition is peculiar only to the emergency under consideration, it should be listed first.</p> <p>(3) Automatic Actions. The automatic actions that will probably occur as a result of the emergency <u>should</u> be identified.</p> <p>(4) Immediate Operator Actions. These steps <u>should</u> specify immediate actions for operation of controls or confirmation of automatic actions that are required to stop the degradation of conditions and mitigate their</p>	<p>QAPD, Part V, Section 3.2</p>	<p>Requirements for Emergency Procedures have been updated through the years through industry initiatives and lessons learned.</p>

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>consequences. Examples include the following:</p> <p>(a) The verification of automatic actions. This step is based on equipment operating as designed and the sequence of events following an expected course. Since variations from the expected course may occur, operators should be prepared to manipulate controls as necessary to cope with the problem. However, the procedure should caution the operator not to place systems in "manual" unless misoperation in "automatic" is apparent, and should require him to make frequent checks for proper operation of systems placed in manual control.</p> <p>(b) Assurance that reactor is in a safe condition. This step usually means shutdown of the reactor with sufficient reactivity margin and establishment of required core cooling.</p> <p>(c) Notification to plant personnel of the nature of the emergency.</p> <p>(d) Determination that the reactor coolant system pressure boundary is intact.</p> <p>(e) Confirmation of the availability of adequate power sources.</p> <p>(f) Confirmation that containment and exhaust systems are operating properly in order to prevent uncontrolled release of radioactivity.</p> <p>(5) Subsequent Operator Actions. Steps <u>should</u> be included to return the reactor to a normal condition or to provide for a safe extended shutdown period under abnormal or emergency conditions.</p> <p>Reg. Guide 1.33 – C. Regulatory Position 5.j:</p> <p>The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard:</p> <p>j. Section 5.3.9.1–The guidelines that describe the content (excluding format) for: the title in Section 5.3.9.1(1); the inclusion of symptoms to aid in identification in Section 5.3.9.1(2); automatic actions in Section 5.3.9.1(3); immediate operator action, excluding those guidelines</p>		

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>contained in the examples, in Section 5.3.9.1(4); and subsequent operator actions in Section 5.3.9.1(5). [NOTE: The affected "should" words are underlined in the N18.7 excerpt above.]</p>		
<p>5.3.9.2 Events of Potential Emergency.</p>		
<p>Potential emergency conditions shall be identified and procedures for coping with them shall be prepared. The following categories of events may, depending upon the design of the plant, be considered as examples of potential emergencies for which procedures are written and for which immediate action is indicated:</p> <ol style="list-style-type: none"> (1) Loss of coolant from identified and unidentified sources, from small loss to design-basis-accident loss (2) Reactor transients and excursions (3) Failure of vital equipment (4) Loss or degradation of vital power sources (5) Civil disturbances (6) Abnormally high radiation levels (7) Excessive release of radioactive liquid or gaseous effluent (8) Malfunction of reactivity control system (9) Loss of containment integrity (10) Conditions that require use of standby liquid poison systems (11) Possible natural occurrences (12) Fires 	<p>QAPD, Part V, Section 3.2</p>	<p>The list contained in N18.7 is provided as examples and is not stated in the QAPD. NRC regulatory guidance and the applicable facility SAR and Emergency Plans will provide the basis for what procedures are necessary.</p>
<p>5.3.9.3 Procedures for Implementing Emergency Plan.</p>		
<p>Implementing procedures for emergency plan actions shall contain, as appropriate, the following elements:</p> <ol style="list-style-type: none"> (1) Individual assignment of authorities and responsibilities for performance of specific tasks to specific individuals or staff positions. (2) Protective action levels and protective measures outlined for the 	<p>QAPD, Part V, Section 3.2</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

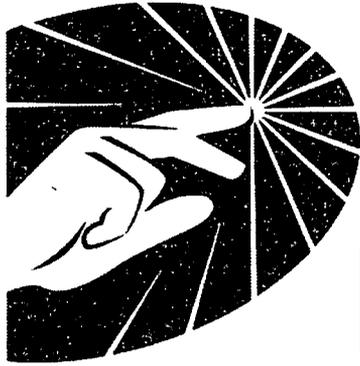
American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
<p>emergency identified.</p> <p>(3) Specific actions to be taken by coordinating support groups.</p> <p>(4) Procedures for medical treatment and handling of contaminated individuals.</p> <p>(5) Special equipment requirements for items such as medical treatment, emergency personnel removal, specific radiation detection, personnel dosimetry and rescue operations, procedures for making this equipment available, plus operating instructions for such equipment, and provisions for its periodic inspection and maintenance.</p> <p>(6) Identification of emergency communications network, including communications required for personnel identification and effective coordination of all support groups.</p> <p>(7) Description of alarm signals in each facility. At sites with multiple units, alarm signals should be consistent from one unit to another. (Signals for initiating protective measures should be clear and distinct from process or operational alarm system to avoid confusion.)</p> <p>(8) Procedures required to restore the plant to normal conditions following an emergency.</p> <p>(9) Requirements for periodically testing of procedures, communications network and alarm systems to assure that they function properly.</p>		
<p>See also U.S. Nuclear Regulatory Commission (NRC) "Guide to the Preparation of Emergency Plans for Production and Utilization Facilities." [17]</p>		
<p>5.3.10 Test and Inspection Procedures.</p>		
<p>Test and inspection procedures shall contain a description of objectives; acceptance criteria that will be used to evaluate the results; prerequisites for performing the tests or inspections including any special conditions to be used to simulate normal or abnormal operating conditions; limiting conditions; and the test or inspection procedure. These procedures shall also specify any special equipment or calibrations required to conduct</p>	<p>NQA-1, Supplement 11S-1, Section 3, and Subpart 2.18, Section 2 QAPD, Part V, Section 3.2</p>	

Table 1 – Comparison of How NQA-1-1994 and the North Anna 3 QAPD Meet the Requirements of Reg. Guide 1.33 and ANSI N18.7-1976

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or North Anna 3 Quality Assurance Program Description (QAPD)	Comments
the test or inspection.		
Test and inspection results shall be documented and evaluated by responsible authority to assure that test and inspection requirements have been satisfied.	NQA-1 Basic Requirements 10 and 11, Supplements 10S-1 and 11S-1 QAPD, Section 5.4	
Where tests and inspections are to be witnessed, the procedure shall identify hold points in the testing sequence to permit witnessing. The procedure shall require appropriate approval for the work to continue beyond the designated hold point. The test and inspection procedures shall require recording the date, identification of those performing the test or inspection, as found condition, corrective actions performed, if any, and as-left condition.	NQA-1, Supplement 10S-1, Sections 4 and 9, Supplement 11S-1, Sections 3, 4, and 5, and Subpart 2.18, Section 2 QAPD, Part V, Section 3.2	

ENCLOSURE 2

**Marked-up Copy of
North Anna Unit 3 Quality Assurance Program Description,
Topical Report DOM-QA-2**



Dominion[®]

North Anna
Unit 3
Quality
Assurance
Program
Description

Topical Report
DOM-QA-2

Revision 1

Policy

Quality Assurance During Construction and Operation

Dominion Virginia Power (Dominion) shall design, procure, construct and operate the North Anna Unit 3 nuclear plant in a manner that will ensure the health and safety of the public and workers. These activities shall be performed in compliance with the requirements of the Code of Federal Regulations (CFR), the applicable Nuclear Regulatory Commission (NRC) Facility Operating Licenses, and applicable laws and regulations of the state and local governments.

The Dominion North Anna Unit 3 Quality Assurance Program (QAP) is the Quality Assurance Program Description (QAPD) provided in this document and the associated implementing documents. Together they provide for control of Dominion activities that affect the quality of safety-related nuclear plant structures, systems, and components (SSCs) and include all planned and systematic activities necessary to provide adequate confidence that such SSCs will perform satisfactorily in service. The QAPD may also be applied to certain equipment and activities that are not safety-related, but support safe plant operations, or where other NRC guidance establishes program requirements.

The QAPD is the top-level policy document that establishes the manner in which quality is to be achieved and presents Dominion's overall philosophy regarding achievement and assurance of quality. Implementing documents assign more detailed responsibilities and requirements and define the organizational interfaces involved in conducting activities within the scope of the QAP. Compliance with the QAPD and implementing documents is mandatory for personnel directly or indirectly associated with implementation of the Dominion North Anna Unit 3 QAP.

Signed Signature on file

David A. Heacock

President and Chief Nuclear Officer

LIST OF EFFECTIVE PARTS

<u>Part</u>		<u>Revision</u>
Policy	Quality Assurance During Construction and Operation	0
Part I	Introduction	1
Part II	QAPD Details	1
Part III	Nonsafety-Related SSC Quality Control	1
Part IV	Regulatory Commitments	1
Part V	Additional Quality Assurance and Administrative Controls for the Plant Operational Phase	1

Contents

Part I Introduction

Section 1 General

1.1 Scope/Applicability 1

Part II QAPD Details

Section 1 Organization

1.1 Chief Nuclear Officer 3

1.2 Nuclear Development 3

 1.2.1 Manager Engineering 4

 1.2.2 Plant Manager 5

 1.2.3 Organizational Effectiveness 6

 1.2.4 Licensing and Regulatory Interface 6

1.3 Nuclear Plant Construction 6

 1.3.1 Manager Construction 6

 1.3.2 Principal Design and Construction Supplier(s) 7

1.4 Nuclear Oversight 7

 1.4.1 Nuclear Development Phase (Development / Construction) 8

 1.4.2 Operations Phase 9

1.5 Operations (Operations Phase) 9

 1.5.1 Facility Operations 9

1.6 Engineering Services (Operations Phase) 12

 1.6.1 Nuclear Engineering 12

 1.6.2 Nuclear Analysis and Fuel 13

 1.6.3 Information Technology 14

1.7 Support Services (Operations Phase) 14

 1.7.1 Licensing and Operations Support 14

 1.7.2 Protection Services and Emergency Preparedness 15

 1.7.3 Training 15

 1.7.4 Supply Chain Management 15

1.8 Authority to Stop Work 15

1.9 Quality Assurance Organizational Independence 16

1.10 NQA-1-1994 Commitment 16

Contents

Section 2	Quality Assurance Program	21
2.1	Responsibilities	21
2.2	Delegation of Work	21
2.3	Site-Specific Safety-Related Design Basis Activities	22
2.4	Periodic Review of the Quality Assurance Program	22
2.5	Issuance and Revision to Quality Assurance Program	22
2.6	Personnel Qualifications	22
2.7	Independent Review	23
2.8	NQA-1-1994 Commitment/Exceptions	25
Section 3	Design Control	27
3.1	Design Verification	27
3.2	Design Records	28
3.3	Computer Application and Digital Equipment Software	28
3.4	Setpoint Control	29
3.5	NQA-1-1994 Commitment/Exceptions	29
Section 4	Procurement Document Control	30
4.1	NQA-1-1994 Commitment/Exceptions	30
Section 5	Instructions, Procedures, and Drawings	32
5.1	Procedure Adherence	32
5.2	Procedure Content	32
5.3	NQA-1-1994 Commitment	32
Section 6	Document Control	34
6.1	Review and Approval of Documents	34
6.2	Changes to Documents	34
6.3	NQA-1-1994 Commitment	35
Section 7	Control of Purchased Material, Equipment, and Services	36
7.1	Acceptance of Item or Service	36
7.2	NQA-1-1994 Commitment/Exceptions	37
Section 8	Identification and Control of Materials, Parts, and Components	40
8.1	NQA-1-1994 Commitment	40

Contents

Section 9	Control of Special Processes	
9.1	NQA-1-1994 Commitment	41
Section 10	Inspection	
10.1	Inspection Program	42
10.2	Inspector Qualification	43
10.3	NQA-1-1994 Commitment/Exceptions	43
Section 11	Test Control	
11.1	NQA-1-1994 Commitment	44
11.2	NQA-1-1994 Commitment for Computer Program Testing	44
Section 12	Control of Measuring and Test Equipment	
12.1	Installed Instrument and Control Devices	46
12.2	NQA-1-1994 Commitment/Exceptions	46
Section 13	Handling, Storage, and Shipping	
13.1	Housekeeping	47
13.2	NQA-1-1994 Commitment/Exceptions	48
Section 14	Inspection, Test, and Operating Status	
14.1	NQA-1-1994 Commitment	50
Section 15	Nonconforming Materials, Parts, or Components	
15.1	Interface with the Reporting Program	51
Section 16	Corrective Action	
16.1	Interface with the Reporting Program	52
16.2	NQA-1-1994 Commitment	52
Section 17	Quality Assurance Records	
17.1	Record Retention	53
17.2	Electronic Records	53
17.3	NQA-1-1994 Commitment/Exceptions	53
Section 18	Audits	
18.1	Performance of Audits	54
18.2	Internal Audits	55
18.3	NQA-1-1994 Commitment	56

Contents

Part III Nonsafety-Related SSC Quality Control

Section 1	Nonsafety-Related SSCs - Significant Contributors to Plant Safety	
1.1	Organization	57
1.2	QA Program	57
1.3	Design Control	57
1.4	Procurement Document Control	57
1.5	Instructions, Procedures, and Drawings	58
1.6	Document Control	58
1.7	Control of Purchased Items and Services	58
1.8	Identification and Control of Purchased Items	58
1.9	Control of Special Processes	58
1.10	Inspection	58
1.11	Test Control	59
1.12	Control of Measuring and Test Equipment (M&TE)	59
1.13	Handling, Storage, and Shipping	59
1.14	Inspection, Test, and Operating Status	59
1.15	Control of Nonconforming Items	59
1.16	Corrective Action	59
1.17	Records	59
1.18	Audits	59
Section 2	Nonsafety-Related SSCs Credited for Regulatory Events	

Part IV Regulatory Commitments

Section 1	NRC Regulatory Guides and Quality Assurance Standards	
1.1	Regulatory Guides	62
1.2	Standards	67

Contents

Part V Additional Quality Assurance and Administrative Controls for the Plant Operational Phase

Section 1	Definitions	
Section 2	Review of Activities Affecting Safe Plant Operation	
2.1	Onsite Operating Organization Review	69
2.2	Independent Review	69
Section 3	Operational Phase Procedures	
3.1	Format and Content	72
3.2	Procedure Types	73
Section 4	Control of Systems and Equipment in the Operational Phase	
Section 5	Plant Maintenance	

Part I Introduction

Section 1 General

Dominion's North Anna Unit 3 Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for combined construction and operating license (COL) activities conducted by or for Dominion. The QAPD describes the methods and establishes quality assurance (QA) and administrative control requirements that meet 10 CFR 50, Appendix B, and 10 CFR 52. The QAPD is based on the requirements and recommendations of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," Parts I, II and III, as specified in this document.

The QA program (QAP) is defined by the NRC-approved regulatory document that describes the QA elements (i.e., the QAPD), along with the associated implementing documents. Procedures and instructions that control North Anna Unit 3 activities will be developed prior to commencement of those activities. Dominion policies establish high-level responsibilities and authority for carrying out important administrative functions. Procedures establish practices for certain activities that are common to all Dominion nuclear business unit organizations performing those activities so that the activity is controlled and carried out in a manner that meets QAPD requirements. Procedures specific to a site, organization, or group establish detailed implementation requirements and methods, and may be used to implement policies or be unique to particular functions or work activities.

1.1 Scope/Applicability

The QAPD applies to COL, construction/pre-operation and operations, activities affecting the quality and performance of safety-related structures, systems, and components, including, but not limited to:

Designing	Cleaning
Siting	Testing
Training	Inspecting
Constructing	Preoperational activities (including ITAAC*)
Procuring	Startup
Receiving	Operating
Storing	Maintaining
Handling	Repairing
Shipping	Refueling
Erecting	Modifying
Installing	Decommissioning
Fabricating	

* ITAAC are those Inspections, Tests, Analyses, and Acceptance Criteria the applicant must satisfy as determined by the Commission in accordance with 10 CFR Part 52.

Safety-related SSCs, under the control of the QAPD, are identified by design documents. The technical aspects of these items are considered when determining program applicability, including, as appropriate, the item's design safety function. The QAPD may be applied to certain activities where regulations other than 10 CFR 50 and 10 CFR 52 establish QA requirements for activities within their scope.

The policy of Dominion is to assure a high degree of availability and reliability of the nuclear plant while ensuring the health and safety of its workers and the public. To this end, selected elements of the QAPD are also applied to certain equipment and activities that are not safety-related, but support safe, economic, and reliable plant operations, or where other NRC guidance establishes quality assurance requirements. Implementing documents establish program element applicability.

The definitions provided in ASME NQA-1-1994, Part 1, Section 1.4, apply to select terms as used in this document.

Part II QAPD Details

Section 1 Organization

This section describes the Dominion organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes corporate support and onsite functions for North Anna Unit 3 including interface responsibilities for multiple organizations that perform quality-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of the QAPD. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

~~Dominion Nuclear Oversight Senior Manager~~ Dominion's senior manager of nuclear oversight is responsible to size the Quality Assurance ~~organization~~ staff commensurate with the duties and responsibilities assigned.

The following sections describe the reporting relationships, functional responsibilities and authorities for organizations implementing and supporting the North Anna Unit 3 QA Program. Titles used herein are generic functional descriptions. Administrative documents are maintained to relate the generic titles to the Dominion specific titles. The Dominion organizations for the North Anna Unit 3 developmental (preconstruction), construction and operations phases are shown in Figures II-1, II-2, and II-3, respectively.

1.1 Chief Nuclear Officer

The Chief Nuclear Officer (CNO) has overall responsibility and authority for implementing all activities associated with the safe and reliable design, construction, operation, and decommissioning of Dominion's nuclear facilities. The CNO establishes the North Anna Unit 3 quality assurance policy and provides guidance regarding its implementation. The CNO has delegated the responsibility and authority for approval of the QAPD to the senior manager of the group responsible for nuclear oversight. The CNO has the authority to resolve disputes related to implementation of the QAPD for which resolution is not achieved at lower levels within the organization. The CNO is responsible for appointing an Independent Review Committee (IRC) chair and assuring the IRC functions as described in Part V, Section 2.2. There are six functional organizations reporting to the CNO that affect the safety of the nuclear facilities: Nuclear Development, Nuclear Plant Construction, Nuclear Oversight, Operations, Engineering Services, and Support Services.

1.2 Nuclear Development

An executive management position is responsible for the development of new nuclear power plants. This includes activities associated with new nuclear plant engineering, analysis, design, procurement, pre-construction preparation, preparing applications, and obtaining permits and licenses for potential construction. Where implementation of any or all of these functions is delegated to organizations outside Dominion, procedures require the establishment of interface documents including defining lines of communication and authorities as appropriate for the delegated functions. However, this executive management position retains responsibility for the scope and effective implementation of the quality assurance program for those functions. While in this developmental phase of the North Anna 3 Project, this portion of the organization will be structured as depicted in Figure II-1, later to be integrated into the Construction Organization, Figure II-2.

1.2.1 Manager Engineering

The functional manager for Engineering is responsible for ~~the conduct of reviews of interface with suppliers performing the non-standard plant design developed by the suppliers, preservice and testing activities during the preoperational and startup period.~~ This group is responsible for procurement of items and services for the new plant. The new plant engineering group is also responsible for document control and collection and preservation of records.

1.2.1.1 Engineering Design Service

Dominion has contracted with ~~General Electric Hitachi (GEH) and Bechtel to perform non-standard plant design activities in support of construction and to adapt the ESBWR design to (such as evaluation of site characteristics and relocating utilities and services that support the operating units) for the North Anna site.~~ Dominion has delegated the responsibility of establishing and executing quality assurance measures for this design activity activities to the respective companies Bechtel in accordance with their approved quality assurance programs program. ~~Dominion has also contracted with GEH to provide safety related long lead time components under the GEH quality assurance program. Dominion reviews and audits the suppliers on a regular basis to ensure conformance with the quality requirements.~~

1.2.1.2 Preservice Testing and Inspection

Preservice testing and inspection duties and responsibilities include the establishment of the programs to ensure required preservice inspections and tests for the plant are identified, performed and documented. This group is responsible

for the incorporation of inspection and test information into the plant inservice inspection and test program and the submittal of required reports.

1.2.1.3 Plant Engineering

Plant engineering duties and responsibilities include establishing and implementing a process for selection and review of design documents produced for the North Anna Unit 3 project. The selection is based on the item's safety significance, complexity of design, standardization, state of the art, and/or similarity to other proven designs. This group is also responsible for providing input to and technical review of Dominion purchase documents for services and items related to the project, including any necessary interface with existing Dominion systems and groups. This group is responsible for the review and approval of the resolution of nonconforming items with a disposition of "accept-as-is" or "repair", i.e., where the action does not fully restore the item to the supplier's design, manufacturing and/or testing specifications, requirements of the purchase document, or purchaser approved documents.

1.2.1.4 Document Control

This group is responsible for control of Dominion documents, such as instructions, procedures, and drawings. This group is also responsible for the collection and preservation of quality assurance records. This group interfaces with existing Dominion processes and personnel in performing these duties.

1.2.2 Plant Manager

The plant manager's group is responsible for developing a trained and qualified staff for licensed operating activities. They accept control of SSCs turned over to Dominion for operation. Functional activities include operation, control, maintenance and start-up testing of the SSCs. This group is responsible for transitioning into the operating phase organization as described in Chapter 13 of the FSAR-SAR.

1.2.2.1 Operations

This group is responsible for operation and control of SSCs that have been turned over to Dominion. This group controls the starting and stopping of components, isolation for maintenance, and assists in the conduct of preoperational and startup tests as necessary. This group ensures sufficient staff are trained and licensed as necessary to progress into the operations phase of the plant.

1.2.2.2 Startup Testing

The startup test group is responsible for the development of procedures, planning, scheduling, and executing startup tests in accordance with the procedures. Qualified test personnel are used to review and approve the procedures. Qualified individuals are designated to review and approve test results.

1.2.2.3 Maintenance

The maintenance group is responsible for developing, scheduling, and performing periodic maintenance, including associated special processes, necessary to ensure the quality of installed SSCs that have been turned over to Dominion. This group assists in the performance of preoperational and startup testing, as necessary, and maintains control of measuring and test equipment for use by Dominion.

1.2.2.4 Training

The training group is responsible to develop and implement a systematic approach to training for operations and maintenance personnel. This group ensures fidelity of the training simulator with the constructed plant. The training group is responsible for achieving and maintaining accreditation of the training program. This group interfaces with the corporate training group for support as needed.

1.2.3 Organizational Effectiveness

The manager of the organizational effectiveness group is responsible for the corrective action program and the construction experience program.

1.2.4 Licensing and Regulatory Interface

The manager of the licensing and regulatory interface group is responsible for corresponding with the NRC on regulatory matters including the combined construction and operating license, other permits, and the completion of ITAAC requirements.

1.3 Nuclear Plant Construction

An executive management position is responsible for the construction of new nuclear power plants. This position assists in establishing contracts, provides oversight and coordination of construction contractors, and manages Dominion's cost and schedules. Suppliers will be used to perform the majority of engineering, procurement, and construction activities. The suppliers will be delegated the responsibility necessary duties and authorities for achieving and assuring quality of the SSCs, however, Dominion retains the overall responsibility for quality.

1.3.1 **Manager Construction**

The manager of construction is responsible for interfacing with contractors for coordination of the overall construction effort to keep the project moving, controlling cost and schedule while maintaining quality of work. The manager construction ensures a process is developed and implemented to identify and resolve construction interferences so that changes are reflected back to the design and as-built configuration of the plant.

1.3.1.1 **Scheduling**

The scheduling personnel provide oversight and coordination of the overall project schedule development and implementation.

1.3.1.2 **Cost**

The cost personnel are responsible for oversight of cost controls for the construction phase of the project.

1.3.1.3 **Procurement**

The procurement personnel are responsible for the development and issuance of Dominion procurement documents for the project. They may interface with existing Dominion systems and personnel in the performance of this activity.

1.3.1.4 **Fire Protection and Industrial Safety**

The fire protection and industrial safety personnel are responsible for the development and implementation of fire protection measures and the industrial safety program during construction. This includes monitoring of supplier performance in these areas.

1.3.2 **Principal Design and Construction Supplier(s)**

Dominion will procure the services of one or more suppliers to develop and implement the North Anna Unit 3 construction project. This will include the activities of detailed construction engineering, procuring items, and the construction and installation of SSCs for the facility. Designation of the entities and their responsibilities will be added to this organization description as the suppliers are identified. Dominion will delegate to these suppliers the duties of and ~~responsibility~~ authorities for establishing and executing a QA program for the design, final siting, construction, procurement, manufacture receipt, storage, handling, shipping, erection, fabrication, installation, inspection, cleaning, and testing of SSCs for the North Anna Unit 3 facility.

1.4 Nuclear Oversight

A senior management position is responsible for the verification of effective Dominion and Supplier QA program development, documentation, and implementation. This position is independent of cost and scheduling concerns associated with construction, operations, maintenance, modification, and decommissioning activities for performing quality assurance program verification. Where implementation of any or all of these functions is delegated to Suppliers, procedures require the establishment of interface documents including defining lines of communication and authorities as appropriate for the delegated functions. However, this senior management position retains responsibility for the scope and effective implementation of the quality assurance program for those functions. This management position has the necessary authority and responsibility for verifying quality achievement; identifying quality problems, recommending solutions and verifying implementation of the solutions; and escalating quality problems to higher management levels. This position has the authority to suspend unsatisfactory work and control further processing or installation of non-conforming materials. The authority to stop work delegated to Nuclear Oversight personnel is delineated in procedures.

1.4.1 Nuclear Development Phase (Development / Construction)

Nuclear Oversight is responsible for QA oversight of the North Anna Unit 3 project. The oversight includes activities in development of the license application, design, procurement, construction, and related activities that affect the quality of SSCs.

1.4.1.1 QA Program Development

This group is responsible for development and maintenance of the QAPD. This group is responsible for verification of the development of the construction QA program through review of and concurrence in quality-related procedures for design, construction, and installation. This group also performs audits of the effectiveness of the QA program implementation within the Dominion new plant development organization.

1.4.1.2 Site QA/QC

This group is responsible for quality oversight of supplier conducted activities at the North Anna construction site through a system of planned audits, surveillances, and inspections as appropriate to the activity and based on the importance of the item or activity to the safety of the plant. This group is responsible for performance of inspections for Dominion activities on SSCs that have been turned over to Dominion for operation.

1.4.1.3 Supplier QA/QC

This group is responsible for quality oversight of suppliers and is performed through a system of audits, surveillances, and inspections as appropriate to the activity and based on the importance of the item or activity to the safety of the plant. This oversight is conducted at Dominion's and Suppliers' facilities. In performance of the oversight, this group will interface with Dominion's existing systems and groups for qualifying suppliers and performing verification activities.

1.4.2 Operations Phase

Nuclear Oversight is responsible for the evaluation of Suppliers' quality programs through a system of external audits, evaluations, and reviews of Supplier performance in accordance with quality assurance requirements. A list of approved Suppliers is maintained. Nuclear Oversight is responsible for assuring Dominion compliance with the QAPD through administration of a comprehensive and systematic internal audit program.

Nuclear Oversight is responsible for developing and maintaining an appropriate quality verification inspection program where not provided for in the facility construction or operating organization functions.

1.4.2.1 Facility Oversight

A management position is responsible for the effective performance of Nuclear Oversight activities. This position performs independent assessment of facility operations related to quality and safety with lines of communication to the executive management position responsible for facility operations.

1.4.2.1.1 Quality Control Inspection

The Quality Control Inspection group plans and conducts inspections of operating facility maintenance and modification activities to ensure quality in accordance with the requirements of the QA program. The Quality Control Inspectors report through this functional organization while performing maintenance and modification inspections for the operating facility.

1.5 Operations (Operations Phase)

An executive management position is responsible for overall operating activities of Dominion's nuclear facilities. This executive is responsible for implementing the quality assurance program during operating activities, including related decommissioning activities.

1.5.1 Facility Operations

An executive management position is responsible for operations of their assigned Dominion nuclear facilities. The necessary responsibility and authority for the management and direction of all activities related to the safe and efficient operation and decommissioning has been delegated by the senior executives. This responsibility includes ensuring quality through implementation of the QAPD in all the activities related to operation such as maintenance, testing, start-up and shutdown, refueling, fuel storage, and modification.

1.5.1.1 Facility Operations and Maintenance

A senior management position is responsible for safe operations and maintenance of the nuclear facilities including those activities necessary for safe storage and handling of spent nuclear fuel during decommissioning. The position responsibilities include: directing the operations, maintenance, planning, and site services groups; implementing facility modifications; and maintaining compliance with requirements of the operating license, Technical Specifications, and applicable federal, state, and local laws, regulations, and codes.

1.5.1.1.1 Operations

Operations is responsible for operating the facility in accordance with the applicable license, including those in a decommissioning phase that still contain nuclear fuel. Overall facility operation is directed by a management position responsible for Operations activities.

Operations activities include monitoring and controlling day-to-day operation of the nuclear facility; responding to alarms; manipulating facility equipment; coordinating facility operations to manage work such as maintenance, testing, and modifications; and moving nuclear fuel. The Operations organization contains supervision and staff for shift operations, including shift managers, unit supervisors, licensed control room operators, and non-licensed operators. Operations is also responsible for the shift technical advisor function. Operations is also responsible for oversight of fire protection measures.

1.5.1.1.2 Maintenance

Maintenance is responsible for directing and coordinating facility maintenance activities including on-line maintenance, installation, maintenance, alterations, adjustment and calibration, replacement and repair of plant electrical and mechanical equipment, and instruments and controls. The responsibilities include performance of surveillances

required by Technical Specifications, establishing standards and frequency of calibration for instrumentation and control devices, and ensuring instrumentation and related testing equipment are properly used, inspected and maintained.

1.5.1.1.3 **Outage and Planning**

Outage & Planning is responsible for planning and scheduling online-maintenance and outage activities.

1.5.1.1.4 **Site Services**

Site Services is responsible for facility project support, including project construction and project controls.

1.5.1.2 **Safety and Licensing**

A senior management position is responsible for ensuring that facility safety and licensing requirements are implemented. This position is responsible for directing and coordinating radiological protection and assessment of nuclear safety issues at the facility, including independent review functions through the independent review body (IRB). The responsibilities also include managing licensing activities; interfacing with corporate management on operating experience and licensing issues, managing facility procedures, and administering the facility environmental compliance program. This position is independent of cost and scheduling concerns associated with operations, maintenance, and modification activities. This position has the authority to suspend unsatisfactory work and control further processing or installation of non-conforming materials. The authority to stop work delegated to quality control inspection personnel is delineated in procedures.

1.5.1.2.1 **Organizational Effectiveness**

Organizational Effectiveness is responsible for the corrective action program and the operating experience program.

1.5.1.2.2 **Radiological Protection and Chemistry**

Radiological Protection & Chemistry carries out health physics and chemistry functions and maintains sufficient organizational freedom and independence from operating pressures as required by the facility Technical Specifications. A qualified supervisor or manager is assigned to fulfill the radiological protection manager position described in Section 2.6 of the QAPD. The radiological protection responsibilities include scheduling and conducting radiological surveys, contamination sample collection, determining contamination levels, assigning work

restrictions through radiation work permits, administering the personnel monitoring program, and maintaining required records in accordance with federal and state codes. The chemistry responsibilities include maintaining primary and secondary plant chemistry in accordance with established program requirements.

1.5.1.2.3 **Procedures**

The Procedures group is responsible for ensuring that procedures are prepared in accordance with applicable regulatory requirements, industry quality standards, and the QAPD.

1.5.1.2.4 **Licensing**

The licensing group is responsible for corresponding with the NRC on license related matters and supporting arrangements for NRC inspections.

1.5.1.2.5 **Quality Control**

The quality control group is responsible for the development and implementation of a QC program for the operating unit. The responsibilities include the planning of inspections and a process for assigning inspections to qualified individuals. This group is responsible for oversight of the training, qualification and certification of inspection personnel.

1.6 Engineering Services (Operations Phase)

An executive management position is responsible for the engineering functions supporting design and construction activities and long-term nuclear operations. These are accomplished through nuclear engineering, projects, nuclear analysis and fuel, information technology, and document control and records management groups. Responsibilities include system level implementation of the requirements established by the QAPD for the nuclear facilities and facility specific engineering and technical support required for day-to-day operations. Where implementation of any or all of these functions is delegated to organizations outside Dominion, procedures require the establishment of interface documents including defining lines of communication and authorities as appropriate for the delegated functions. However, this executive management position retains responsibility for the scope and effective implementation of the quality assurance program for those functions.

1.6.1 Nuclear Engineering

A senior management position is responsible for design engineering functions and supporting activities. Such as independent design checks and reviews, developing and maintaining engineering programs, including those for nondestructive examination (NDE), and the facility inservice inspection and test (ISI/IST) programs; configuration management including design and configuration control, and developing and revising facility drawings; and engineering technical support at the operating facilities.

1.6.1.1 Design Engineering

Design engineering is responsible for managing engineering resources providing day-to-day technical support for facility operations. The functions include engineering and technical support at a system and component level to ensure optimum design basis performance, system reliability, and optimum component performance and reliability. Support is also provided in developing and implementing testing programs, tracking and scheduling test performance, and evaluating test results. The test programs include inservice inspections, Technical Specification surveillances, post-modification and post-maintenance testing, and nondestructive examinations.

1.6.1.2 Project Engineering

Project engineering is responsible for the implementation of large projects for the nuclear facilities on behalf of Dominion. Implementation includes development of the detailed scope, estimate, schedule, cost, design, procurement, construction, testing, and closeout of each project. Project engineering focuses on defined projects separate from ongoing routine engineering projects.

1.6.1.3 Engineering Programs

Engineering programs is responsible for providing support in classifying SSCs, maintaining the design control program, developing and implementing the inservice inspection and test programs, and ensuring the design basis for the facility is maintained.

~~1.6.1.3.4 Document Control and Records Management~~

~~Document control and records management groups are assigned responsibility to ensure controlled documents (such as manuals, instructions, procedures, and drawings) and facility records are maintained in accordance with applicable regulatory requirements, industry quality standards, and the QAPD.~~

1.6.1.3.2 Fire Protection Engineer

The fire protection engineer is responsible for maintaining the fire protection design basis and assisting with the resolution of problems related to fire protection at the site.

1.6.2 Nuclear Analysis and Fuel

A senior management position is responsible for activities related to safety and management of nuclear fuel. Nuclear Analysis and Fuel (NAF) is responsible for engineering activities, evaluation, and analysis of: core design, fuel and reactor performance, probabilistic risk assessment, spent fuel storage, and radiological effects. NAF provides reactor-engineering support for the operating power stations. NAF is responsible for nuclear fuel procurement, assurance of nuclear fuel quality through surveillances and inspections at Dominion and supplier facilities, and special nuclear material accountability. This position has the authority to control further processing or installation of nonconforming materials. The authority delegated to inspection and surveillance personnel is delineated in procedures. NAF is also responsible for providing engineering oversight of dry cask spent fuel storage system fabrication, including approval of nonconformance disposition.

1.6.3 Information Technology

A senior management position is responsible for direction and support of information technology for the nuclear organizations and facilities. Responsibilities include: network infrastructure maintenance and upgrade, network and application security, network operations; automation strategy, application development and support, automation training; development and maintenance of the software control program; and oversight, maintenance, and repair of the Emergency Response Facility Computer System.

1.7 Support Services (Operations Phase)

An executive management position is responsible to provide licensing, fire protection, security, emergency preparedness, training, and procurement support services to the Nuclear Organization. Where implementation of any or all of these functions is delegated to organizations outside Dominion, procedures require the establishment of interface documents including defining lines of communication and authorities as appropriate for the delegated functions. However, this executive management position retains responsibility for the scope and effective implementation of the quality assurance program for those functions.

1.7.1 **Licensing and Operations Support**

A senior management position is responsible for providing regulatory compliance and licensing support through NRC communications, maintaining and acquiring licenses required for continued and extended operations and providing operations, chemistry and health physics support.

1.7.1.1 **Document Control and Records Management**

Document control and records management groups are assigned responsibility to ensure controlled documents (such as manuals, instructions, procedures, and drawings) and facility records are maintained in accordance with applicable regulatory requirements, industry quality standards, and the QAPD.

1.7.2 **Protection Services and Emergency Preparedness**

A senior management position is responsible for providing nuclear facility security, and overall management of Nuclear Emergency Preparedness activities.

1.7.2.1 Protection Services

Protection Services is responsible for facility protective services, including physical security, nuclear facility access programs, and fitness for duty programs. Protection Services is also responsible for industrial safety and loss prevention including oversight of fire protection measures.

1.7.2.2 Emergency Preparedness

Emergency Preparedness is responsible for development and maintenance of Dominion radiological emergency plans and coordination with required off-site radiological emergency response groups for the nuclear facilities. This includes managing the overall scheduling and coordination of emergency plan testing, training and exercises with federal, state, and local agencies, and working with corporate and facility personnel to ensure emergency plans meet all the requirements and commitments.

1.7.3 **Training**

A senior management position is responsible for the training of personnel who operate or support the nuclear facilities. Training responsibilities include: determining the need for training based on information provided by the various groups, developing performance-based training programs, implementing training programs to support employee and facility needs, and evaluating training programs. Certain functional groups may be assigned responsibility for the development and conduct of their own training

programs provided these groups are not required to have a systems approach to training under 10 CFR 50.120.

1.7.4 Supply Chain Management

A senior management position is responsible for material management, purchasing, procurement engineering, Supplier surveillance functions, and source and receipt inspection. This position has the authority to control further processing or installation of nonconforming materials. This authority is delegated to inspection and surveillance personnel as delineated in procedures.

1.8 Authority to Stop Work

Quality assurance and inspection personnel have the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or SSC integrity may be jeopardized. This extends to offsite work performed by suppliers that furnish safety-related materials and services to Dominion.

1.9 Quality Assurance Organizational Independence

For the COL construction activities, independence shall be maintained between the organization or organizations performing the checking (quality assurance and control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

1.10 NQA-1-1994 Commitment

In establishing its organizational structure, Dominion commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.

Figure II-1 Pre-construction Organization

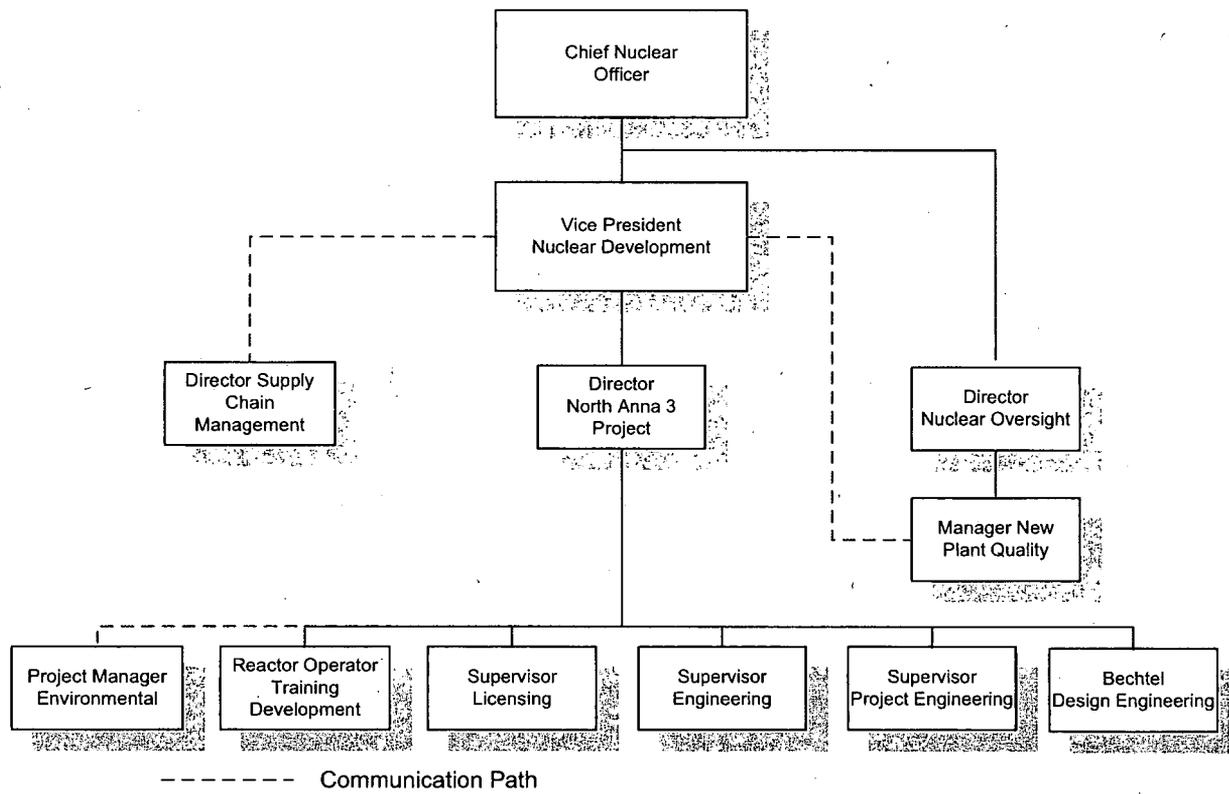


Figure II-2 Construction Organization

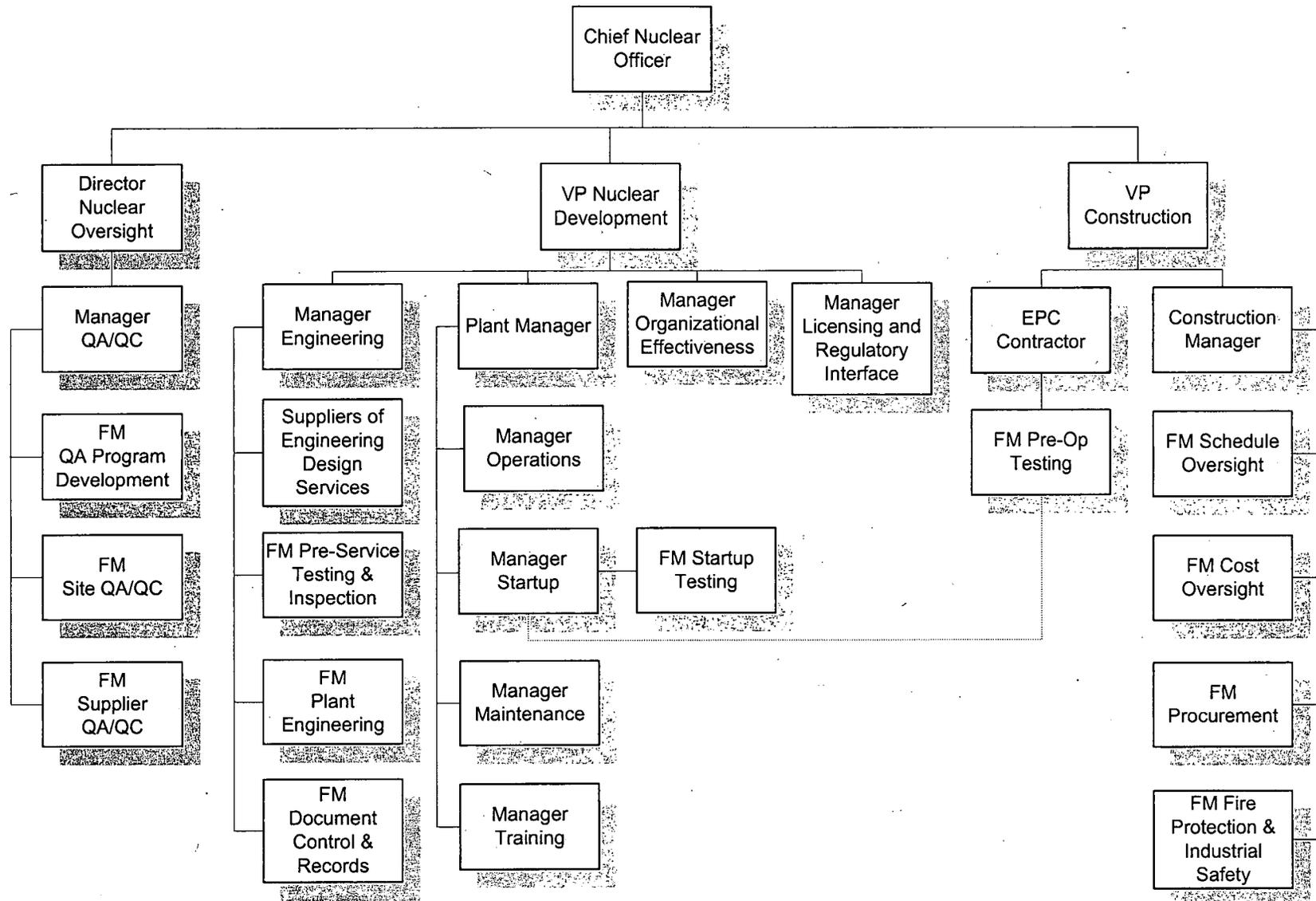
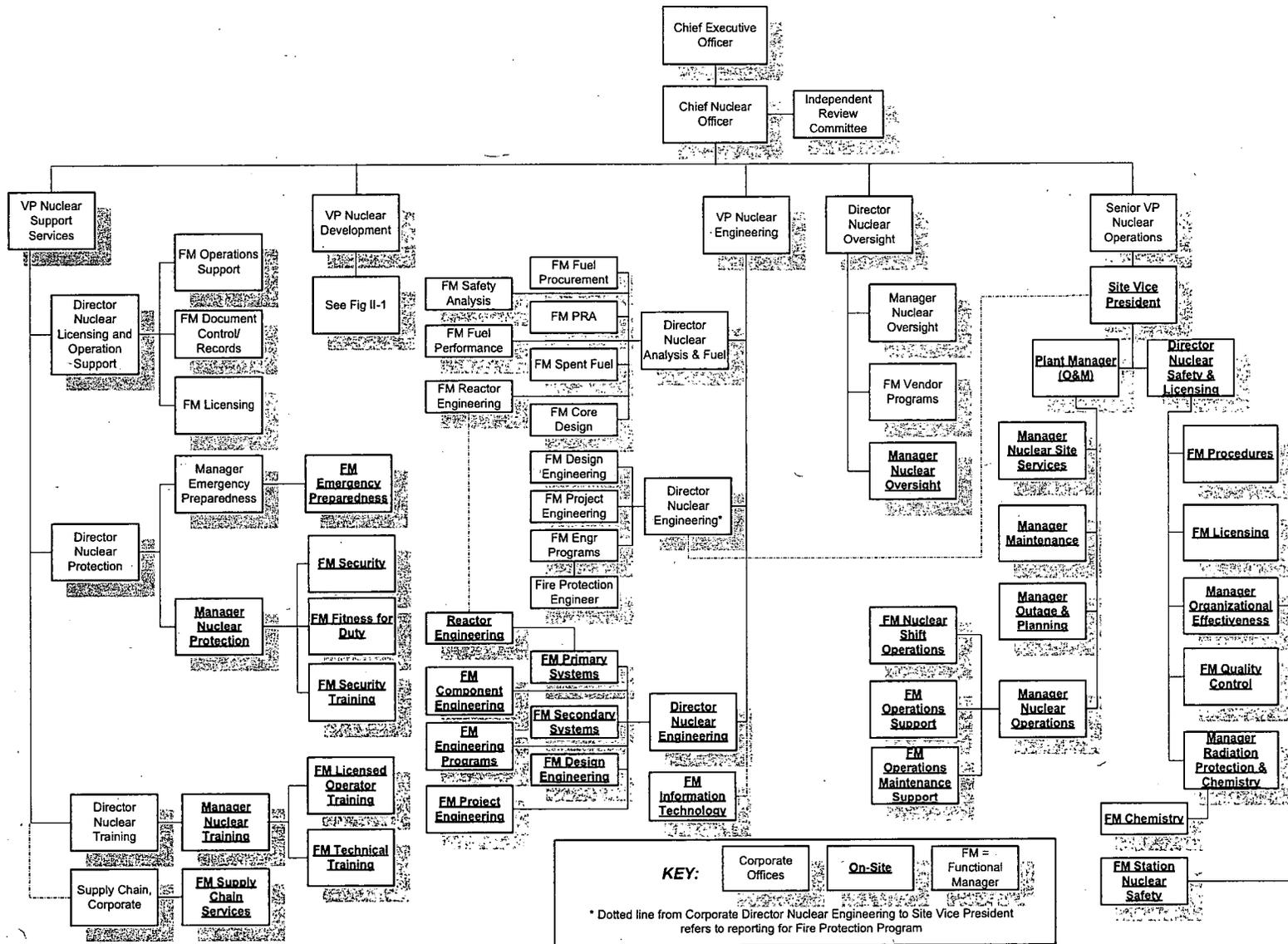


Figure II-3 Operating Organization



Section 2 Quality Assurance Program

Dominion has established the necessary measures and governing procedures to implement the QAP as described in the QAPD. Dominion is committed to implementing the QAP in all aspects of work that are important to the safety of the nuclear plant as described and to the extent delineated in the QAPD. Further, Dominion ensures through the systematic process described herein that its suppliers of safety-related equipment or services meet the applicable requirements of 10 CFR 50, Appendix B. Senior management is regularly apprised of the adequacy of implementation of the QAP through the audit functions described in Part II, Section 18.

The objective of the QAP is to assure that the North Anna Unit 3 nuclear generating plant is designed, constructed, and operated in accordance with governing regulations and license requirements. The program is based on the requirements of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," as further described in this document. The QAP applies to those quality-related activities that involve the functions of safety-related SSCs associated with the design (excluding Design Certification activities), fabrication, construction, and testing of the facility ~~SSC~~ SSCs, and to the managerial and administrative controls used to assure safe operations. Examples of COL safety-related activities include, but are not limited to, site-specific engineering related to safety-related SSCs, site geotechnical investigations, site engineering analysis, seismic analysis, and meteorological analysis. A list or system that identifies SSCs and activities to which this program applies is maintained at the appropriate facility. The Design Certification Document is used as the basis for this list or system. Cost and scheduling functions do not prevent proper implementation of the QAP.

As described in Part III of the QAPD, specific program controls are applied to nonsafety-related SSCs, for which 10 CFR 50, Appendix B, is not applicable, that are significant contributors to plant safety. The specific program controls consistent with applicable sections of the QAPD are applied to those items in a selected manner, targeted at those characteristics or critical attributes that render the SSC a significant contributor to plant safety.

Delegated responsibilities may be performed under a supplier's or principal contractor's QAP ~~Program~~ provided that the supplier or principal contractor has been approved as a supplier in accordance with the ~~QAP~~ QAPD. Periodic audits and assessments of supplier QA programs are performed to assure compliance with the supplier's or principal contractor's QAPD and implementing procedures. In addition, routine interfaces with supplier's personnel provide added assurance that quality expectations are met.

For the COL application, the QAPD applies to those North Anna Unit 3 and Dominion activities that can affect either directly or indirectly the safety-related site characteristics or analysis of those characteristics. In addition, the QAPD applies to engineering activities that are used to characterize the site or analyze that characterization.

New nuclear plant construction will be the responsibility of Dominion's North Anna Unit 3 organization. Detailed engineering specifications and construction procedures will be developed to implement the QAPD and EPC QA programs prior to commencement of construction (COL) activities. Examples of Limited Work Authorization (LWA) activities that could impact safety-related SSCs include impacts of construction to existing facilities and for construction of new plants, the interface between nonsafety-related and safety-related SSCs, and the placement of seismically-designed backfill.

In general, the program requirements specified herein are detailed in implementing procedures that are either Dominion/North Anna Unit 3 implementing procedures, or supplier implementing procedures governed by a supplier quality assurance program.

A grace period of 90 days may be applied to provisions that are required to be performed on a periodic basis unless otherwise noted. Annual evaluations and audits that must be performed on a triennial basis are examples where the 90 day grace period could be applied. The grace period does not allow the "clock" for a particular activity to be reset forward. The "clock" for an activity is reset backwards by performing the activity early. ~~Audits~~ Audit schedules are based on the month in which the audit starts.

2.1 Responsibilities

Personnel who work directly or indirectly for Dominion are responsible for achieving acceptable quality in the work covered by the QAPD. This includes those activities delineated in Part I, Section 1.1. Dominion personnel performing verification activities are responsible for verifying the achievement of acceptable quality. Activities governed by the QAPD are performed as directed by documented instructions, procedures, and drawings that are of a detail appropriate for the activity's complexity and effect on safety. Instructions, procedures, and drawings specify quantitative or qualitative acceptance criteria, as applicable or appropriate for the activity, and verification is against these criteria. Provisions are established to designate or identify the proper documents to be used in an activity, and to ascertain that such documents are being used. The North Anna Unit 3 nuclear oversight manager is responsible to verify that processes and procedures comply with the QAPD and other applicable requirements, that such processes or procedures are implemented, and that management appropriately ensures compliance.

2.2 Delegation of Work

Dominion retains and exercises the responsibility for the scope and implementation of an effective QAP. Positions identified in Part II, Section 1, may delegate all or part of the activities of planning, establishing, and implementing the program for which they are responsible to others, but retain the responsibility for the program's effectiveness. Decisions

affecting safety are made at the level appropriate for its nature and effect, and with any necessary technical advice or review.

2.3 Site-Specific Safety-Related Design Basis Activities

Site-specific safety-related design basis activities are defined as those activities, including sampling, testing, data collection, and supporting engineering calculations and reports, that will be used to determine the bounding physical parameters of the site. Appropriate quality assurance measures are applied.

2.4 Periodic Review of the Quality Assurance Program

Management of those organizations implementing the QA program, or portions thereof, assess the adequacy of that part of the program for which they are responsible to assure its effective implementation at least once each year or at least once during the life of the activity, whichever is shorter. However, the period for assessing QA programs during the operations phase may be extended to once every two years.

2.5 Issuance and Revision to Quality Assurance Program

Administrative control of the QAPD will be in accordance with 10 CFR 50.55(f) and 10 CFR 50.54(a), as appropriate. Changes to the QAPD are evaluated by the nuclear oversight manager to ensure that such changes do not degrade previously approved quality assurance controls specified in the QAPD. This document shall be revised as appropriate to incorporate additional QA commitments, that may be established during the COL application development process. New revisions to the document will be reviewed, at a minimum, by the Dominion manager responsible for North Anna Unit 3 nuclear oversight and approved by the senior manager responsible for Dominion's nuclear oversight group.

Regulations require that the ~~FSAR~~-SAR include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied. In order to comply with this requirement, the ~~FSAR~~-SAR references the QAPD and, as a result, the requirements of 10 CFR 50.54(a) are satisfied by and apply to the QAPD.

2.6 Personnel Qualifications

Personnel assigned to implement elements of the QAPD shall be capable of performing their assigned tasks. To this end, Dominion establishes and maintains formal indoctrination and training programs for personnel performing, verifying, or managing activities within the scope of the QAPD to assure that suitable proficiency is achieved and maintained. Plant and support staff minimum qualification requirements are as delineated in the unit 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 Dominion procedures. Indoctrination includes the administrative and technical objectives, requirements of the applicable codes and standards, and the QAPD 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.

The minimum qualifications of the senior management position for Dominion's nuclear oversight group and the management position for North Anna Unit 3 nuclear oversight are that each holds an engineering or related science degree and a minimum of four years of related experience including two years of nuclear power plant experience, one year of supervisory or management experience, and one year of the experience is in performing quality verification activities. Special requirements shall include 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. Individuals who do not possess these formal education and minimum experience requirements should not be eliminated automatically when other factors provide sufficient demonstration of their abilities. These other factors are evaluated on a case-by-case basis and approved and documented by senior management.

The minimum qualifications for the individuals responsible for supervising QA or QC personnel is that each has a high school diploma or equivalent and has a minimum of 1 year of experience performing quality verification activities. Individuals who do not possess these formal education and experience requirements should not be eliminated automatically when other factors provide sufficient demonstration of their abilities. These other factors are evaluated on a case-by-case basis and approved and documented by senior management.

The minimum qualifications of the individuals responsible for planning, implementing, and maintaining the QAPD are that each has a high school diploma or equivalent and has a minimum of one year of related experience. Individuals who do not possess these formal education and minimum experience requirements should not be eliminated automatically when other factors provide sufficient demonstration of their abilities. These other factors are evaluated on a case-by-case basis and approved and documented by senior management.

2.7 Independent Review

~~Activities occurring during the operational phase shall be independently reviewed on a periodic basis. The independent review program shall be functional prior to initial core loading. The independent review function performs the following:~~

- ~~Reviews proposed changes to the facility as described in the safety analysis report (SAR). The Independent Review Body (IRB) also verifies that changes do not adversely affect safety and if a technical specification change or NRC review is required.~~
- ~~Reviews proposed tests and experiments not described in the SAR. Changes to proposed tests and experiments not described in the SAR that do require a technical specification change must be reviewed by the IRB prior to NRC submittal and implementation.~~
- ~~Reviews proposed technical specification changes and license amendments relating to nuclear safety prior to NRC submittal and implementation, except in those cases where the change is identical to a previously approved change.~~
- ~~Reviews violations, deviations, and events that are required to be reported to the NRC. This review includes the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.~~
- ~~Reviews any matter related to nuclear safety that is requested by the Site Executive or any IRB member.~~
- ~~Reviews corrective actions for significant conditions adverse to quality.~~
- ~~Reviews the adequacy of the audit program every 24 months.~~

~~A group may function as an independent review body (IRB). In discharging its review responsibilities, the IRB keeps safety considerations paramount when opposed to cost or schedule considerations. One or more organizational units may collectively perform this function.~~

~~IRB reviews are supplemented as follows:~~

- ~~A qualified person, independent of the preparer, reviews proposed changes in the procedures as described in the SAR prior to implementation of the change to determine if a technical specification change or NRC approval is required.~~
- ~~Audits of selected changes in the procedures described in the SAR are performed to verify that procedure reviews and revision controls are effectively implemented.~~
- ~~Competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization verify that changes to the facility do not result in a loss of adequate design or safety margins.~~

~~The results of IRB reviews of matters involving the safe operation of the facility are periodically independently reviewed. This review is intended to support management in identifying and resolving issues potentially affecting safe plant operation. This review supplements the existing corrective action programs and audits.~~

- ▲ ~~The review is performed by a team consisting of personnel with experience and competence in the activities being reviewed, but independent from cost and schedule considerations and from the organizations responsible for those activities.~~
- ▲ ~~The review is supplemented by outside consultants or organizations as necessary to ensure the team has the requisite expertise and competence.~~
- ▲ ~~Results of the review are documented and reported to responsible management.~~
- ▲ ~~Management periodically consider issues they determine warrant special attention, such as deficient plant programs, declining performance trends, employee concerns, or other issues related to safe plant operations and determine what issues warrant the review.~~
- ▲ ~~Management determines the scheduling and scope of review and the composition of the team performing the review.~~

2.8 NQA-1-1994 Commitment/Exceptions

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

- NQA-1-1994, Supplement 2S-1
 - Supplement 2S-1 will include use of the guidance provided in Appendix 2A-1 the same as if it were part of the Supplement. During the operations phase, The the following two alternatives may be applied to the implementation of this Supplement and Appendix:
 - (1) In lieu of being certified as Level I, II, or III in accordance with NQA-1-1994, personnel that perform independent quality verification inspections, examinations, measurements, or tests of material, products, or activities will be required to possess qualifications equal to or better than those required for performing the task being verified; and the verification is within the skills of these personnel and/or is addressed by procedures. 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, and determining who will be responsible for performing the inspections), evaluating inspection training programs, nor certifying inspection personnel.
 - (2) A qualified engineer may be used to plan inspections, evaluate the capabilities of an inspector, or evaluate the training program for inspectors. For the purpose of these functions, a qualified engineer is one who has a baccalaureate in engineering in a discipline related to the inspection activity (such as electrical, mechanical, civil) and has a minimum of five years engineering work experience with at least two years of this experience related to nuclear facilities.

- NQA-1-1994, Supplement 2S-2
 - In lieu of Supplement 2S-2, for qualification of nondestructive examination personnel, North Anna Unit 3 will follow the applicable standard cited in the version(s) of Section III and Section XI of the ASME Boiler and Pressure Vessel Code approved by the NRC for use at the North Anna Unit 3 site.

- NQA-1-1994, 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, as implemented by ~~North Anna Unit 3~~ Dominion, to effectively lead an audit team, and to effectively organize and report results, including participation in at least one nuclear audit within the year preceding the date of qualification."

Section 3 Design Control

Dominion has established and implements a process to control the design, design changes, and temporary modifications (e.g., temporary bypass lines, electrical jumpers and lifted wires, and temporary setpoints) of items that are subject to the provisions of the QAPD. The design process includes provisions to control design inputs, outputs, changes, interfaces, records, and organizational interfaces within Dominion and with suppliers. These provisions assure that design inputs (such as design bases and the performance, regulatory, quality, and quality verification requirements) are correctly translated into design outputs (such as analyses, specifications, drawings, procedures, and instructions) so that the final design output can be related to the design input in sufficient detail to permit verification. Design change processes and the division of responsibilities for design-related activities are detailed in North Anna Unit 3 and supplier procedures. The design control program includes interface controls necessary to control the development, verification, approval, release, status, distribution, and revision of design inputs and outputs. Design changes and disposition of nonconforming items as "use as is" or "repair" are reviewed and approved by the North Anna Unit 3 design organization or by other organizations so authorized by Dominion.

Design documents are reviewed by individuals knowledgeable in QA to ensure the documents contain the necessary QA requirements.

3.1 Design Verification

Dominion design processes provide for design verification to ensure that items and activities subject to the provisions of the QAPD are suitable for their intended application, consistent with their effect on safety. Design changes are subjected to these controls, which include verification measures commensurate with those applied to original plant design.

Design verifications are performed by competent individuals or groups other than those who performed the original design but who may be from the same organization. The verifier shall not have taken part in the selection of design inputs, the selection of design considerations, or the selection of a singular design approach, as applicable. This verification may be performed by the originator's supervisor provided the supervisor did not specify a singular design approach, rule out certain design considerations, and did not establish the design inputs used in the design, or if the supervisor is the only individual in the organization competent to perform the verification. If the verification is performed by the originator's supervisor, the justification of the need is documented and approved in advance by management.

The extent of the design verification required is a function of the importance to safety of the item under consideration, the complexity of the design, the degree of standardization, the state-of-the-art, and the similarity with previously proven designs. This includes design inputs, design outputs, and design changes. Design verification procedures are established and

implemented to assure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria are identified, and the verification is satisfactorily accomplished and documented. Verification methods may include, but are not limited to, design reviews, alternative calculations and qualification testing. Testing used to verify the acceptability of a specific design feature demonstrates acceptable performance under conditions that simulate the most adverse design conditions expected for the item's intended use.

~~North Anna Unit 3~~ Dominion normally completes design verification activities before the design outputs are used by other organizations for design work, and before they are used to support other activities such as procurement, manufacture, or construction. When such timing cannot be achieved, the design verification is completed before relying on the item to perform its intended design or safety function.

3.2 Design Records

Dominion maintains records sufficient to provide evidence that the design was properly accomplished. These records include the final design output and any revisions thereto, as well as record of the important design steps (e.g., calculations, analyses and computer programs) and the sources of input that support the final output.

Plant design drawings reflect the properly reviewed and approved configuration of the plant.

3.3 Computer Application and Digital Equipment Software

The QAPD governs the development, procurement, testing, maintenance, and use of computer application and digital equipment software when used in safety-related applications and designated nonsafety-related applications. Dominion and suppliers are responsible for developing, approving, and issuing procedures, as necessary, to control the use of such computer application and digital equipment software. The procedures require that the application software be assigned a proper quality classification and that the associated quality requirements be consistent with this classification. Each application software and revision thereto is documented and approved by the code manager as delineated in the software control procedures. The QAPD is also applicable to the administrative functions associated with the maintenance and security of computer hardware where such functions are considered essential in order to comply with other QAPD requirements such as QA records.

3.4 Setpoint Control

Instrument and equipment setpoints that could affect nuclear safety shall be controlled in accordance with written instructions. As a minimum, these written instructions shall:

- (1) Identify responsibilities and processes for reviewing, approving, and revising setpoints and setpoint changes originally supplied by the reactor plant supplier, the A/E, and the plant's technical staff.
- (2) Ensure that setpoints and setpoint changes are consistent with design and accident analysis requirements and assumptions.
- (3) Provide for documentation of setpoints, including those determined operationally.
- (4) Provide for access to necessary setpoint information for personnel who write or revise plant procedures, operate or maintain plant equipment, develop or revise design documents, or develop or revise accident analyses.

3.5 NQA-1-1994 Commitment/Exceptions

In establishing its program for design control and verification, Dominion commits to compliance with NQA-1-1994, Basic Requirement 3, and Supplement 3S-1, the subsurface investigation requirements in Subpart 2.20, and the standards for computer software in Subpart 2.7.

Section 4 Procurement Document Control

Dominion has established the necessary measures and governing procedures to assure that purchased items and services are subject to appropriate quality and technical requirements. Procurement document changes shall be subject to the same degree of control as utilized in the preparation of the original documents. These controls include provisions such that:

- Where original technical or quality assurance requirements cannot be determined, an engineering evaluation is conducted and documented by qualified staff to establish appropriate requirements and controls to assure that interfaces, interchangeability, safety, fit and function, as applicable, are not adversely affected or contrary to applicable regulatory requirements.
- Applicable technical, regulatory, administrative, quality and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and 10 CFR 21) are invoked for procurement of items and services. 10 CFR 21 requirements for posting, evaluating, and reporting will be followed and imposed on suppliers when applicable. Applicable design bases and other requirements necessary to assure adequate quality shall be included or referenced in documents for procurement of items and services. To the extent necessary, procurement documents shall require suppliers to have a documented QA program that is determined to meet the applicable requirements of 10 CFR 50, Appendix B, as appropriate to the circumstances of procurements (or the supplier may work under Dominion's North Anna Unit 3 approved QA program).

Reviews of procurement documents shall be performed by personnel who have access to pertinent information and who have an adequate understanding of the requirements and intent of the procurement documents.

4.1 NQA-1-1994 Commitment/Exceptions

In establishing controls for procurement, Dominion commits to compliance with NQA-1-1994, Basic Requirement 4 and Supplement 4S-1, with the following clarifications and exceptions:

- NQA-1-1994, Supplement 4S-1
 - Section 2.3 of this Supplement 4S-1 includes a requirement that procurement documents require suppliers to have a documented QAP that implements NQA-1-1994, Part 1. In lieu of this requirement, Dominion may require suppliers to have a documented supplier QAP that is determined to meet the applicable requirements of 10 CFR 50, Appendix B, as appropriate to the circumstances of the procurement.
 - With regard to service performed by a supplier, Dominion procurement documents may allow the supplier to work under the North Anna Unit 3 QAP, including implementing procedures, in lieu of the supplier having its own QAP.

- Section 3 of this Supplement 4S-1 requires procurement documents to be reviewed prior to bid or award of contract. 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. Procurement document changes (e.g., scope, technical or quality requirements) will also receive the quality assurance review.
- Procurement documents for Commercial Grade Items that will be procured by Dominion for North Anna Unit 3 for use as safety-related items shall contain technical and quality requirements such that the procured item can be appropriately dedicated.

Section 5 Instructions, Procedures, and Drawings

~~North Anna Unit 3~~ Dominion has established the necessary measures and governing procedures to ensure that activities affecting quality are prescribed by and performed in accordance with instructions, procedures, or drawings of a type appropriate to the circumstances and which, where applicable, include quantitative or qualitative acceptance criteria to implement the QAP as described in the QAPD. Such documents are prepared and controlled according to Part II, Section 6. In addition, means are provided to disseminate to the staff instructions of both general and continuing applicability, as well as those of short-term applicability. Provisions are included for reviewing, updating, and canceling such procedures.

5.1 Procedure Adherence

Dominion's policy is that procedures are followed, and the requirements for use of procedures have been established in administrative procedures. Where procedures cannot be followed as written, provisions are established for making changes in accordance with Part II, Section 6. Requirements are established to identify the manner in which procedures are to be implemented, including identification of those tasks that require: (1) the written procedure to be present and followed step-by-step while the task is being performed, (2) the user to have committed the procedure steps to memory, (3) verification of completion of significant steps, by initials or signatures or use of check-off lists. Procedures that are required to be present and referred to directly are those developed for extensive or complex jobs where reliance on memory cannot be trusted, tasks that are infrequently performed, and tasks where steps must be performed in a specified sequence.

In cases of emergency, personnel are authorized to depart from approved procedures when necessary to prevent injury to personnel or damage to the plant. Such departures are recorded describing the prevailing conditions and reasons for the action taken.

5.2 Procedure Content

The established measures address the applicable content of procedures as described in the introduction to Part II of NQA-1-1994. In addition, procedures governing tests, inspections, operational activities and maintenance will include as applicable, initial conditions and prerequisites for the performance of the activity.

5.3 NQA-1-1994 Commitment

In establishing procedural controls, Dominion commits to compliance with NQA-1-1994, Basic Requirement 5.

Section 6 Document Control

Dominion has established the necessary measures and governing procedures to control the preparation of, issuance of, and changes to documents that specify quality requirements or prescribe how activities affecting quality, including organizational interfaces, are controlled to assure that correct documents are being employed. The control systems (including electronic systems used to make documents available) are documented and provide for the following:

- a. identification of documents to be controlled and their specified distribution;
- b. a method to identify the correct document (including revision) to be used and control of superseded documents;
- c. identification of assignment of responsibility for preparing, reviewing, approving, and issuing documents;
- d. review of documents for adequacy, completeness, and correctness prior to approval and issuance;
- e. a method for providing feedback from users to continually improve procedures and work instructions; and
- f. coordinating and controlling interface documents and procedures.

The types of documents to be controlled include:

- a. drawings such as design, construction, installation, and as-built drawings;
- b. engineering calculations;
- c. design specifications;
- d. purchase orders and related documents;
- e. vendor-supplied documents;
- f. audit, surveillance, and quality verification/inspection procedures;
- g. inspection and test reports;
- h. instructions and procedures for activities covered by the QAPD including design, construction, installation, operating (including normal and emergency operations), maintenance, calibration, and routine testing;
- i. technical specifications; and
- j. nonconformance reports and corrective action reports.

During the operational phase, where temporary procedures are used, they shall include a designation of the period of time during which it is acceptable to use them.

6.1 Review and Approval of Documents

Documents are reviewed for adequacy by qualified persons other than the preparer. During the construction phase, procedures for design, construction, and installation are also reviewed by the nuclear oversight group to ensure quality assurance measures have been appropriately applied. The documented review signifies concurrence.

During the operations phase, documents affecting the configuration or operation of the station as described in the SAR are screened to identify those that require review by the ~~IRB~~ IRC prior to implementation as described in ~~Part II, Section II-3~~ Part V, Section 2.2.

To ensure effective and accurate procedures during the operational phase, applicable procedures are reviewed, and updated as necessary, based on the following conditions:

- a. following any modification to a system;
- b. following an unusual incident, such as an accident, significant operator error, or equipment malfunction;
- c. when procedure discrepancies are found;
- d. prior to use if not used in the previous two years; or
- e. results of QA audits conducted in accordance with Part II, Section 18.1.

Prior to issuance or use, documents including revisions thereto, are approved by the designated authority. A listing of all controlled documents identifying the current approved revision, or date, is maintained so personnel can readily determine the appropriate document for use.

6.2 Changes to Documents

Changes to documents, other than those defined in implementing procedures as minor changes, are reviewed and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated. The reviewing organization has access to pertinent background data or information upon which to base their approval. Where temporary procedure changes are necessary during the operations phase, changes that clearly do not change the intent of the approved procedure may be implemented provided they are approved by two members of the staff knowledgeable in the areas affected by the procedures. Minor changes to documents, such as inconsequential editorial corrections, do not require that the revised documents receive the same review and approval as the original documents. To avoid a possible omission of a required review, the

type of minor changes that do not require such a review and approval and the persons who can authorize such a classification are clearly delineated in implementing procedures.

6.3 NQA-1-1994 Commitment

In establishing provisions for document control, Dominion commits to compliance with NQA-1-1994, Basic Requirement 6 and Supplement 6S-1.

Section 7 Control of Purchased Material, Equipment, and Services

Dominion has established the necessary measures and governing procedures to control the procurement of items and services to assure conformance with specified requirements. Such control provides for the following as appropriate: source evaluation and selection, evaluation of objective evidence of quality furnished by the supplier, source inspection, audit, and examination of items or services.

7.1 Acceptance of Item or Service

Dominion establishes and implements measures to assess the quality of purchased items and services, whether purchased directly or through contractors, at intervals and to a depth consistent with the item's or service's importance to safety, complexity, quantity, and the frequency of procurement. Verification actions include testing, as appropriate, during design, fabrication, ~~and construction,~~ and operation activities. Verifications occur at the appropriate phases of the procurement process, including, as necessary, verification of activities of suppliers below the first tier.

Measures to assure the quality of purchased items and services include the following, as applicable:

- Items are inspected, identified, and stored to protect against damage, deterioration, or misuse.
- Prospective suppliers of safety-related items and services are evaluated to assure that only qualified suppliers are used. Qualified suppliers are audited on a triennial basis. In addition, if a subsequent contract or a contract modification significantly enlarges the scope of, or changes the methods or controls for activities performed by the same supplier, an audit of the modified requirements is conducted, thus starting a new triennial period. North Anna Unit 3 may utilize audits conducted by outside organizations for supplier qualification provided that the scope and adequacy of the audits meet North Anna Unit 3 requirements. Documented annual evaluations are performed for qualified suppliers to assure they continue to provide acceptable products and services. Industry programs, such as those applied by ASME, Nuclear Procurement Issues Committee (NUPIC), or other established utility groups, are used as input or the basis for supplier qualification whenever appropriate. The results of the reviews are promptly considered for effect on a supplier's continued qualification and adjustments made as necessary (including corrective actions, adjustments of supplier audit plans, and input to third party auditing entities, as warranted). In addition, results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality requiring additional action.

- Provisions are made for accepting purchased items and services, such as source verification, receipt inspection, pre- and post-installation tests, certificates of conformance, and document reviews (including Certified Material Test Report/Certificate). Acceptance actions/documents should be established by the Purchaser with appropriate input from the Supplier and be completed to ensure that procurement, inspection, and test requirements, as applicable, have been satisfied before relying on the item to perform its intended safety function.
- Controls are imposed for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt and acceptance of commercial-grade services or items to assure they will perform satisfactorily in service in safety-related applications.
- If there is insufficient evidence of implementation of a QA program, the initial evaluation is of the existence of a QA program addressing the scope of services to be provided. The initial audit is performed after the supplier has completed sufficient work to demonstrate that its organization is implementing a QA program.

7.2 NQA-1-1994 Commitment/Exceptions

In establishing procurement verification controls, North Anna Unit 3 commits to compliance with NQA-1-1994, Basic Requirement 7 and Supplement 7S-1, with the following clarifications and exceptions:

- NQA-1-1994, Supplement 7S-1
 - North Anna Unit 3 considers that other 10 CFR 50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other State and Federal agencies which may provide items or services to the Dominion North Anna Unit 3 plant are not required to be evaluated or audited.
 - When purchasing commercial grade calibration services from a calibration laboratory, procurement source evaluation and selection measures need not be performed provided each of the following conditions are met:
 - (1) The purchase documents impose any additional technical and administrative requirements, as necessary, to comply with the North Anna Unit 3 QA program and technical provisions. At a minimum, the purchase document shall require that the calibration certificate/report include identification of the laboratory equipment/standard used.
 - (2) The purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance.
 - (3) A documented review of the supplier's accreditation will be performed and will include a verification of each of the following:

- The calibration laboratory holds a domestic (United States) accreditation by any one of the following bodies, which are recognized by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA):
 - National Voluntary Laboratory Accreditation Program (NVLAP), administered by the National Institute of Standards & Technology;
 - American Association for Laboratory Accreditation (A2LA);
 - ACLASS Accreditation Services (ACLASS);
 - International Accreditation Service (IAS);
 - Laboratory Accreditation Bureau (L-A-B);
 - Other NRC-approved laboratory accrediting body.
 - The accreditation encompasses ANS/ISO/IEC 17025, "General Requirements for the Competence of Testing and Calibration Laboratories."
 - The published scope of accreditation for the calibration laboratory covers the necessary measurement parameters, range, and uncertainties.
- For Section 8.1, Dominion considers documents that may be stored in approved electronic media under Dominion or vendor control, not physically located on the plant site, but are accessible from the respective nuclear facility site, as meeting the NQA-1 requirement for documents to be available at the site. When construction is complete, sufficient as-built documentation will be turned over to Dominion to support operations. The Dominion records management system will provide for timely retrieval of necessary records.
- In lieu of the requirements of Section 10, Commercial Grade Items, controls for commercial grade items and services are established in North Anna Unit 3 documents using 10 CFR 21 and the guidance of EPRI NP-5652 as discussed in Generic Letter 89-02 and Generic Letter 91-05.
- For commercial grade items, special quality verification requirements are established and described in Dominion documents to provide the necessary assurance an item will perform satisfactorily in service. The Dominion documents address determining the critical characteristics that ensure an item is suitable for its intended use, technical evaluation of the item, receipt requirements, and quality evaluation of the item.

- Dominion will also use other appropriate approved regulatory means and controls to support Dominion commercial grade dedication activities. ~~One example of this is Electric Power Research Institute (EPRI) Topical Report TR 106439, "Guideline on Evaluation and Acceptance of Commercial Grade Digital Equipment for Nuclear Safety Applications," dated July 17, 1997.~~ Dominion will assume 10 CFR 21 reporting responsibility for all items that Dominion dedicates as safety-related.

Section 8 Identification and Control of Materials, Parts, and Components

Dominion has established the necessary measures and governing procedures to identify and control items to prevent the use of incorrect or defective items. This includes controls for consumable materials and items with limited shelf life. The identification of items is maintained throughout fabrication, erection, installation and use so that the item can be traced to its documentation, consistent with the item's effect on safety. Identification locations and methods are selected so as not to affect the function or quality of the item.

8.1 NQA-1-1994 Commitment

In establishing provisions for identification and control of items, Dominion commits to compliance with NQA-1-1994, Basic Requirement 8 and Supplement 8S-1.

Section 9 Control of Special Processes

Dominion has established the necessary measures and governing procedures to assure that special processes that require interim process controls to assure quality, such as welding, heat treating, and nondestructive examination, are controlled. These provisions include assuring that special processes are accomplished by qualified personnel using qualified procedures and equipment. Personnel are qualified and special processes are performed in accordance with applicable codes, standards, specifications, criteria or other specially established requirements. Special processes are those where the results are highly dependent on the control of the process or the skill of the operator, or both, and for which the specified quality cannot be fully and readily determined by inspection or test of the final product.

9.1 NQA-1-1994 Commitment

In establishing measures for the control of special processes, Dominion commits to compliance with NQA-1-1994, Basic Requirement 9 and Supplement 9S-1.

Section 10 Inspection

Dominion has established the necessary measures and governing procedures to implement inspections that assure items, services, and activities affecting safety meet established requirements and conform to applicable documented specifications, instructions, procedures, and design documents. Inspection may also be applied to items, services, and activities affecting plant reliability and integrity. Types of inspections may include those verifications related to procurement, such as source, in-process, final, and receipt inspection, as well as construction, installation, maintenance, modification, inservice, and operations activities. Inspections are carried out by properly qualified persons independent of those who performed or directly supervised the work. Inspection results are documented.

10.1 Inspection Program

The inspection program establishes inspections (including surveillance of processes), as necessary to verify quality: (1) at the source of supplied items or services, (2) in-process during fabrication at a supplier's facility or at a Company facility, (3) for final acceptance of fabricated and/or installed items during construction, (4) upon receipt of items for a facility, and (5) during maintenance, modification, inservice, and operating activities.

The inspection program establishes requirements for planning inspections, such as the group or discipline responsible for performing the inspection, where inspection hold points are to be applied, determining applicable acceptance criteria, the frequency of inspection to be applied, and identification of special tools needed to perform the inspection. Inspection planning is performed by personnel qualified in the discipline related to the inspection and includes qualified inspectors or engineers. Inspection plans are based on, as a minimum, the importance of the item to the safety of the facility, the complexity of the item, technical requirements to be met, and design specifications. Where significant changes in inspection activities for the facilities are to occur, management responsible for the inspection programs evaluate the resource and planning requirements to ensure effective implementation of the inspection program.

Inspection program documents establish requirements for performing the planned inspections, and documenting required inspection information such as rejection, acceptance, and reinspection results, and the person(s) performing the inspection.

Inspection results are documented by the inspector, reviewed by authorized personnel qualified to evaluate the technical adequacy of the inspection results, and controlled by instructions, procedures, and drawings.

10.2 Inspector Qualification

Dominion has established qualification programs for personnel performing quality inspections. The qualification program requirements are described in Part II, Section II-3. These qualification programs are applied to individuals performing quality inspections regardless of the functional group where they are assigned.

10.3 NQA-1-1994 Commitment/Exceptions

In establishing inspection requirements, Dominion commits to compliance with NQA-1-1994, Basic Requirement 10, Supplement 10S-1 and Subpart 2.4, with the following clarification. In addition, Dominion commits to compliance with the requirements of Subparts 2.5 and 2.8 for establishing appropriate inspection requirements.

- Subpart 2.4 commits Dominion to IEEE Std. 336-1985. IEEE Std. 336 1985 refers to IEEE Std. 498-1985. Both IEEE Std. 336-1985 and IEEE Std. 498-1985 use the definition of "Safety Systems ~~Equipment~~" from IEEE Std. 603-1980. North Anna Unit 3 commits to the definition of Safety Systems ~~Equipment~~ in IEEE Std. 603 1980, but does not commit to the balance of that standard. This definition is only applicable to equipment in the context of Subpart 2.4.
- An additional exception to Subpart 2.4 is addressed in Part II, Section 12 of the QAPD.
- Where inspections at the operating facility are performed by persons within the same organization (e.g., Maintenance group), Dominion takes exception to the requirements of NQA-1-1994, Supplement ~~10S-2~~ 10S-1, Section 3.1, in that the inspectors report to the site's Senior Manager for Safety and Licensing while performing those inspections.

Section 11 Test Control

Dominion has established the necessary measures and governing procedures to demonstrate that items subject to the provisions of the QAPD will perform satisfactorily in service, that the plant can be operated safely and as designed, and that the coordinated operation of the plant as a whole is satisfactory. These programs include criteria for determining when testing is required, such as proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, in-service tests, and operational tests (such as surveillance tests required by Plant Technical Specifications), to demonstrate that the performance of plant systems is in accordance with design. Programs also include provisions to establish and adjust test schedules, and to maintain status for periodic or recurring tests. Tests are performed according to applicable procedures that include, consistent with the effect on safety: (1) instructions and prerequisites to perform the test, (2) use of proper test equipment, (3) acceptance criteria, and (4) mandatory verification points as necessary to confirm satisfactory test completion. Test results are documented and evaluated by the organization performing the test and reviewed by a responsible authority to assure that the test requirements have been satisfied. If acceptance criteria are not met, retesting is performed as needed to confirm acceptability following correction of the system or equipment deficiencies that caused the failure.

The initial start-up test program is planned and scheduled to permit safe fuel loading and start-up; to increase power in safe increments; and to perform major testing at specified power levels. If tests require the variation of operating parameters outside of their normal range, the limits within which such variation is permitted will be prescribed. The scope of the testing demonstrates, insofar as practicable, that the plant is capable of withstanding the design transients and accidents. For new facility construction, the suitability of facility operating procedures is checked to the maximum extent possible during the preoperational and initial start-up test programs.

Tests are performed and results documented in accordance with applicable technical and regulatory requirements, including those described in the Technical Specifications and SAR. Test programs ensure appropriate retention of test data in accordance with the records requirements of the QAPD. Personnel that perform or evaluate tests are qualified in accordance with the requirements established in Part II, Section II-3.

11.1 NQA-1-1994 Commitment

In establishing provisions for testing, Dominion commits to compliance with NQA-1-1994, Basic Requirement 11 and Supplement 11S-1.

11.2 NQA-1-1994 Commitment for Computer Program Testing

Dominion establishes and implements provisions to assure that computer software used in applications affecting safety is prepared, documented, verified and tested, and used such that

the expected output is obtained and configuration control maintained. To this end, Dominion commits to compliance with the requirements of NQA-1-1994, Supplement 11S-2 and Subpart 2.7 to establish the appropriate provisions.

Section 12 Control of Measuring and Test Equipment

Dominion has established the necessary measures and governing procedures to control the calibration, maintenance, and use of measuring and test equipment (M&TE) that provides information important to safe plant operation. The provisions of such procedures cover equipment such as indicating and actuating instruments and gages, tools, reference and transfer standards, and nondestructive examination equipment. The suppliers of commercial-grade calibration services are controlled as described in Part II, Section 7.

12.1 Installed Instrument and Control Devices

For the operations phase of the facilities, Dominion has established and implements procedures for the calibration and adjustment of instrument and control devices installed in the facility. The calibration and adjustment of these devices is accomplished through the facility maintenance programs to ensure the facility is operated within design and technical requirements. Appropriate documentation will be maintained for these devices to indicate the control status, when the next calibration is due, and identify any limitations on use of the device.

12.2 NQA-1-1994 Commitment/Exceptions

In establishing provisions for control of measuring and test equipment, Dominion commits to compliance with NQA-1-1994, Basic Requirement 12 and Supplement 12S-1 with the following clarification and exception:

- The out of calibration conditions described in paragraph 3.2 of Supplement 12S-1 refers to when the M&TE is found out of the required accuracy limits (i.e., out of tolerance) during calibration.
- Measuring and test equipment are not required to be marked with the calibration status where it is impossible or impractical due to equipment size or configuration (such as the label will interfere with operation of the device) provided the required information is maintained in suitable documentation traceable to the device. This exception also applies to the calibration labeling requirement stated in NQA-1-1994, Subpart 2.4, Section 7.2.1 (ANSI/IEEE Std. 336-1985).

Section 13 Handling, Storage, and Shipping

Dominion has established the necessary measures and governing procedures to control the handling, storage, packaging, shipping, cleaning, and preservation of items to prevent inadvertent damage or loss, and to minimize deterioration. These provisions include specific procedures, when required to maintain acceptable quality of the items important to the safe operations of the plant. Items are appropriately marked and labeled during packaging, shipping, handling and storage to identify, maintain, and preserve the item's integrity and indicate the need for special controls. Special controls (such as containers, shock absorbers, accelerometers, inert gas atmospheres, specific moisture content levels and temperature levels) are provided when required to maintain acceptable quality.

Special or additional handling, storage, shipping, cleaning and preservation requirements are identified and implemented as specified in procurement documents and applicable procedures. Where special requirements are specified, the items and containers (where used) are suitably marked.

Special handling tools and equipment are used and controlled as necessary to ensure safe and adequate handling. Special handling tools and equipment are inspected and tested at specified time intervals and in accordance with procedures to verify that the tools and equipment are adequately maintained.

Operators of special handling and lifting equipment are experienced or trained in the use of the equipment. During the operational phase, Dominion 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. Where required, Dominion complies with applicable hoisting, rigging and transportation regulations and codes.

13.1 Housekeeping

Housekeeping practices are established to account for conditions or environments that could affect the quality of structures, systems and components within the plant. This includes control of cleanness of facilities and materials, fire prevention and protection, disposal of combustible material and debris, control of access to work areas, protection of equipment, radioactive contamination control and storage of solid radioactive waste. Housekeeping practices help assure that only proper materials, equipment, processes and procedures are used and that the quality of items is not degraded. Necessary procedures or work instructions, such as for electrical bus and control center cleaning, cleaning of control consoles, and radioactive decontamination are developed and used.

13.2 NQA-1-1994 Commitment/Exceptions

In establishing provisions for handling, storage and shipping, Dominion commits to compliance with NQA-1-1994, Basic Requirement 13 and Supplement 13S-1. Dominion also commits, during the construction and ~~pre-operational~~ operational ~~phase~~ phases of the plant, to compliance with the requirements of NQA-1-1994, Subpart 2.1, Subpart 2.2, Subpart 2.3, and Subpart 3.2, Appendix 2.1, with the following clarifications and exceptions:

- NQA -1-1994, Subpart 2.1

- Subpart 2.1, Sections 3.1 and 3.2 establish criteria for classifying items into cleanliness classes and requirements for each class. During the operational phase, instead of using the cleanliness level system of Subpart 2.1, Dominion may establish cleanliness requirements on a case-by-case basis, consistent with the other provisions of Subpart 2.1. Dominion 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 material prior to system closure.

- NQA -1-1994, Subpart 2.2

- Subpart 2.2, Section 2.2 establishes criteria for classifying items into protection levels. Instead of classifying items into protection levels during the operational phase, Dominion may establish controls for the packaging, shipping, handling, and storage of such items on a case-by-case basis with due regard for the item's complexity, use, and sensitivity to damage. Prior to installation or use, the items are inspected and serviced as necessary to assure that no damage or deterioration exists which could affect their function.
- Subpart 2.2, Section 6.6, "Storage Records:" This section requires written records be prepared containing information on personnel access. As an alternative to this requirement, North Anna Unit 3 documents establish controls for storage areas that describe those authorized to access areas and the requirements for recording access of personnel. However, these records of access are not considered quality records and will be retained in accordance with the administrative controls of the applicable plant.
- 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 the nuclear power plant during construction.

- NQA-1-1994, Subpart 2.3

- Subpart 2.3, Section 2.3 requires the establishment of five zone designations for housekeeping cleanliness controls. During the operational phase, instead of the five-level zone designation, Dominion bases its control over housekeeping activities on a consideration of what is necessary and appropriate for the activity involved. The controls are implemented through procedures or instructions which, in the case of maintenance or modification work, are developed on a case-by-case basis. Factors considered in developing the procedures and instructions include cleanliness control, personnel safety, fire prevention and protection, radiation control and security. The procedures and instructions make use of standard janitorial and work practices to the extent possible.
- NQA-1-1994, Subpart 3.2
 - Subpart 3.2, Appendix 2.1: Only Section 3 precautions are being committed to in accordance with RG 1.37. In addition, a suitable chloride stress-cracking inhibitor should be added to the fresh water used to flush systems containing austenitic stainless steels.

Section 14 Inspection, Test, and Operating Status

Dominion has established the necessary measures and governing procedures to identify the inspection, test, and operating status of items and components subject to the provisions of the QAPD in order to maintain personnel and reactor safety and avoid inadvertent operation of equipment. Where necessary to preclude inadvertent bypassing of inspections or tests, or to preclude inadvertent operation, these measures require the inspection, test, or operating status be verified before release, fabrication, receipt, installation, test, or use. These measures also establish the necessary authorities and controls for the application and removal of status indicators or labels.

In addition, temporary design changes (temporary modifications), such as temporary bypass lines, electrical jumpers and lifted wires, and temporary trip-point settings, are controlled by procedures that include requirements for appropriate installation and removal, independent/concurrent verifications, and status tracking.

Administrative procedures also describe the measures taken to control altering the sequence of required tests, inspections, and other operations. Review and approval for these actions is subject to the same control as taken during the original review and approval of tests, inspections, and other operations.

14.1 NQA-1-1994 Commitment

In establishing measures for control of inspection, test, and operating status, Dominion commits to compliance with NQA-1-1994, Basic Requirement 14.

Section 15 Nonconforming Materials, Parts, or Components

Dominion has established the necessary measures and governing procedures to control items, including services, that do not conform to specified requirements to prevent inadvertent installation or use. Instructions require that the individual discovering a nonconformance identify, describe, and document the nonconformance in accordance with the requirements of Part II, Section 16. Controls provide for identification, documentation, evaluation, segregation when practical, and disposition of nonconforming items, and for notification to affected organizations. Controls are provided to address conditional release of nonconforming items for use on an at-risk basis prior to resolution and disposition of the nonconformance, including maintaining identification of the item and documenting the basis for such release. Conditional release of nonconforming items for installation requires the approval of the designated management. Nonconformances are corrected or resolved prior to depending on the item to perform its intended safety function. Nonconformances are evaluated for impact on operability of quality structures, systems, and components to assure that the final condition does not adversely affect safety, operation, or maintenance of the item or service. Nonconformances to design requirements dispositioned repair or use-as-is are subject to design control measures commensurate with those applied to the original design. Nonconformance dispositions are reviewed for adequacy, analysis of quality trends, and reports provided to the designated management. Significant trends are reported to management in accordance with Dominion procedures, regulatory requirements, and industry standards.

15.1 Interface with the Reporting Program

Dominion has ~~the necessary measures and governing procedures that implement a~~ appropriate interfaces between the QAP for identification and control of nonconforming materials, parts, or components and the non-QA reporting program that conforms to satisfy the requirements of 10 CFR 52, 10 CFR 50.55 and/or 10 CFR 21 during COL design and construction, and 10 CFR 21 during operations. NQA-1-1994 Commitment

In establishing measures for nonconforming materials, parts, or components, Dominion commits to compliance with NQA-1-1994, Basic Requirement 15, and Supplement 15S-1.

Section 16 Corrective Action

Dominion has established the necessary measures and governing procedures to promptly identify, control, document, classify, and correct conditions adverse to quality. Dominion procedures assure that corrective actions are documented and initiated following the determination of conditions adverse to quality in accordance with regulatory requirements and applicable quality standards. Dominion procedures require personnel to identify known conditions adverse to quality. When complex issues arise where it cannot be readily determined if a condition adverse to quality exists, Dominion documents establish the requirements for documentation and timely evaluation of the issue. Reports of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality and significant adverse trends are documented and reported to responsible management. In the case of a significant condition adverse to quality, the cause is determined and actions to preclude recurrence are taken.

In the case of suppliers working on safety-related activities, or other similar situations, Dominion may delegate specific responsibilities ~~of the Corrective Action program for corrective actions~~ but Dominion maintains responsibility for the program's effectiveness of corrective action measures.

16.1 Interface with the Reporting Program

Dominion has ~~the necessary measures and governing procedures that implement~~ appropriate interfaces between the QAP for corrective actions and the non-QA reporting program that conforms to satisfy the requirements of 10 CFR 52, 10 CFR 50.55 and/or 10 CFR Part 21, during COL design and construction, and 10 CFR 21 during operations.

16.2 NQA-1-1994 Commitment

In establishing provisions for corrective action, Dominion commits to compliance with NQA-1-1994, Basic Requirement 16.

Section 17 Quality Assurance Records

Dominion has the necessary measures and governing procedures to ensure that sufficient records of items and activities affecting quality are developed, reviewed, approved, issued, used, and revised to reflect completed work. The provisions of such procedures establish the scope of the records retention program for Dominion and include requirements for records administration, including receipt, preservation, retention, storage, safekeeping, retrieval, access controls, user privileges, and final disposition.

17.1 Record Retention

Measures are established that ensure that sufficient records of completed items and activities affecting quality are appropriately stored. ~~Such records~~ Records of activities for design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, and audits and their retention times are defined in appropriate procedures. The records and retention times are based on Regulatory Position C.2 and Table 1 of Regulatory Guide 1.28, Revision 3, for design, construction and initial startup. Retention times for operations phase records are based on construction records that are similar in nature. In all cases where state, local, or other agencies have more restrictive requirements for record retention, those requirements will be met.

17.2 Electronic Records

When using electronic records storage and retrieval systems, Dominion complies with the NRC guidance in Generic Letter 88-18, "Plant Record Storage on Optical Disks." Dominion will manage the storage of QA Records in electronic media consistent with the intent of RIS 2000-18 and associated NIRMA Guidelines TG 11-1998, TG15-1998, TG16-1998, and TG21-1998.

17.3 NQA-1-1994 Commitment/Exceptions

In establishing provisions for records, Dominion commits to compliance with NQA-1-1994, Basic Requirement 17 and Supplement 17S-1, with the following clarifications and exceptions:

- NQA-1-1994, Supplement 17S-1
 - Supplement 17S-1, Section 4.2(b) requires records to be firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets or on shelving in containers. For hard-copy records maintained by Dominion, the records are suitably stored in steel file cabinets or on shelving in containers, except that methods other than binders, folders, or envelopes may be used to organize the records for storage.

Section 18 Audits

Dominion has established the necessary measures and governing procedures to implement audits to verify that activities covered by the QAPD are performed in conformance with the requirements established. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process.

18.1 Performance of Audits

Internal audits of selected aspects of licensing, design, construction phase and operating activities are performed with a frequency commensurate with safety significance and in a manner which assures that audits of safety-related activities are completed. During the early portions of North Anna Unit 3 COL activities, audits will focus on areas including, but not limited to, site investigation, procurement, and corrective action. Functional areas of an organization's QA program for auditing include, at a minimum, verification of compliance and effectiveness of implementation of internal rules, procedures (e.g., operating, design, procurement, maintenance, modification, refueling, surveillance, and test), Technical Specifications, regulations and license conditions, programs for training, retraining, qualification and performance of operating staff, corrective actions, and observation of performance of operating, refueling, maintenance and modification activities, including associated recordkeeping.

The audits are scheduled on a formal preplanned audit schedule. The audit system is reviewed periodically and revised as necessary to assure coverage commensurate with current and planned activities. Additional audits may be performed as deemed necessary by management. The scope of the audit is determined by the quality status and safety importance of the activities being performed. These audits are conducted by trained personnel not having direct responsibilities in the area being audited and in accordance with preplanned and approved audit plans or checklists, under the direction of a qualified lead auditor and the cognizance of the manager for the North Anna Unit 3 nuclear oversight group.

Dominion is responsible for conducting periodic internal and external audits. Internal audits are conducted to determine the adequacy of programs and procedures (by representative sampling), and to determine if they are meaningful and comply with the overall QAPD. External audits determine the adequacy of supplier and contractor quality assurance program.

The results of each audit are reported in writing to the CNO, and the executives responsible for the area audited. Additional internal distribution is made to other concerned management levels in accordance with approved procedures.

Management responds to all audit findings and initiates corrective action where indicated. 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.

Audits of suppliers of safety-related components and/or services are conducted as described in Section 7.1.

18.2 Internal Audits

Internal audits of organization and facility activities, conducted prior to placing the facility in operation, should be performed in such a manner as to assure that an audit of all applicable QA program elements is completed for each functional area at least once each year or at least once during the life of the activity, whichever is shorter.

Internal audits of activities, conducted after placing the facility in operation, should be performed 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. Internal audit frequencies of well established activities, conducted after placing the facility in operation, may be extended one year at a time beyond the above two-year interval based on the results of an annual evaluation of the applicable functional area and objective evidence that the functional area activities are being satisfactorily accomplished. The evaluation should include a detailed performance analysis of the functional area based upon applicable internal and external source data and due consideration of the impact of any functional area changes in responsibility, resources, or management. However, the internal audit frequency interval should not exceed a maximum of four years. If an adverse trend is identified in the applicable functional area, the extension of the internal audit frequency interval should be rescinded and an audit scheduled as soon as practicable.

During the operations phase, audits are performed at a frequency commensurate with the safety significance of the activities and in such a manner to assure audits of all applicable QA program elements are completed within a period of two years. These audits will include, as a minimum, activities in the following areas:

- (1) The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions including administrative controls.
- (2) The performance, training, and qualifications of the facility staff.
- (3) The performance of activities required by the QAPD to meet the criteria of 10 CFR 50, Appendix B.
- (4) The Fire Protection Program and implementing procedures. A fire protection equipment and program implementation inspection and audit are conducted utilizing either a qualified offsite licensed fire protection engineer or an outside qualified fire protection consultant.

- (5) Other activities and documents considered appropriate by the corporate executive for nuclear operations, or the CNO.

Audits may also be used to meet the periodic review requirements of the code for the Security, Emergency Preparedness, and Radiological Protection programs within the provisions of the applicable code.

Internal audits include verification of compliance and effectiveness of the administrative controls established for implementing the requirements of the QAPD; regulations and license provisions; provisions for training, retraining, qualification, and performance of personnel performing activities covered by the QAPD; corrective actions taken following abnormal occurrences; and, observation of the performance of construction, fabrication, operating, refueling, maintenance and modification activities including associated record keeping.

18.3 NQA-1-1994 Commitment

In establishing the independent audit program, Dominion commits to compliance with NQA-1-1994, Basic Requirement 18 and Supplement 18S-1.

Part III Nonsafety-Related SSC Quality Control

Section 1 Nonsafety-Related SSCs - Significant Contributors to Plant Safety

Specific program controls are applied to nonsafety-related SSCs, for which 10 CFR 50, Appendix B is not applicable, that are significant contributors to plant safety. The specific program controls consistent with applicable sections of the QAPD are applied to those items in a selected manner, targeted at those characteristics or critical attributes that render the SSC a significant contributor to plant safety.

The following clarify the applicability of the QA Program to the nonsafety-related SSCs and related activities, including the identification of exceptions to the QA Program described in Part II, Sections 1 through 18 taken for nonsafety-related SSCs.

1.1 Organization

Verification activities described in this part may be performed by the Dominion line organization, the QA organization described in Part II is not required to perform these functions.

1.2 QA Program

Dominion QA requirements for nonsafety-related SSCs are established in the QAPD and appropriate procedures. Suppliers of these SSCs or related services describe the quality controls applied in appropriate procedures. A new or separate QA program is not required.

1.3 Design Control

Dominion has design control measures to ensure that the contractually established design requirements are included in the design. These measures ensure that applicable design inputs are included or correctly translated into the design documents, and deviations from those requirements are controlled. Design verification is provided through the normal supervisory review of the designer's work.

1.4 Procurement Document Control

Procurement documents for items and services obtained by or for Dominion include or reference documents describing applicable design bases, design requirements, and other requirements necessary to ensure component performance. The procurement documents are controlled to address deviations from the specified requirements.

1.5 Instructions, Procedures, and Drawings

Dominion provides documents such as, but not limited to, written instructions, plant procedures, drawings, vendor technical manuals, and special instructions in work orders, to direct the performance of activities affecting quality. The method of instruction employed provides an appropriate degree of guidance to the personnel performing the activity to achieve acceptable functional performance of the SSC.

1.6 Document Control

Dominion controls the issuance and change of documents that specify quality requirements or prescribe activities affecting quality to ensure that correct documents are used. These controls include review and approval of documents, identification of the appropriate revision for use, and measures to preclude the use of superseded or obsolete documents.

1.7 Control of Purchased Items and Services

Dominion employs measures, such as inspection of items or documents upon receipt or acceptance testing, to ensure that all purchased items and services conform to appropriate procurement documents.

1.8 Identification and Control of Purchased Items

Dominion employs measures where necessary, to identify purchased items and preserve their functional performance capability. Storage controls take into account appropriate environmental, maintenance, or shelf life restrictions for the items.

1.9 Control of Special Processes

Dominion employs process and procedure controls for special processes, including welding, heat treating, and nondestructive testing. These controls are based on applicable codes, standards, specifications, criteria, or other special requirements for the special process.

1.10 Inspection

Dominion uses documented instructions to ensure necessary inspections are performed to verify conformance of an item or activity to specified requirements or to verify that activities are satisfactorily accomplished. These inspections ~~are~~ may be performed by knowledgeable personnel ~~who may be in the same line organization as those performing the activity being inspected, in the line organization.~~ Knowledgeable personnel are from the same discipline and have experience related to the work being inspected.

1.11 Test Control

Dominion employs measures to identify required testing that demonstrates that equipment conforms to design requirements. These tests are performed in accordance with test instructions or procedures. The test results are recorded, and authorized individuals evaluate the results to ensure that test requirements are met.

1.12 Control of Measuring and Test Equipment (M&TE)

Dominion employs measures to control M&TE use, and calibration and adjustment at specific intervals or prior to use.

1.13 Handling, Storage, and Shipping

Dominion employs measures to control the handling, storage, cleaning, packaging, shipping, and preservation of items to prevent damage or loss, and to minimize deterioration. These measures include appropriate marking or labels, and identification of any special storage or handling requirements.

1.14 Inspection, Test, and Operating Status

Dominion employs measures to identify items that have satisfactorily passed required tests and inspections and to indicate the status of inspection, test, and operability as appropriate.

1.15 Control of Nonconforming Items

Dominion employs measures to identify and control items that do not conform to specified requirements to prevent their inadvertent installation or use.

1.16 Corrective Action

Dominion employs measures to ensure that failures, malfunctions, deficiencies, deviations, defective components, and nonconformances are properly identified, reported, and corrected.

1.17 Records

Dominion employs measures to ensure records are prepared and maintained to furnish evidence that the above requirements for design, procurement, document control, inspection, and test activities have been met.

1.18 Audits

Dominion employs measures for line management to periodically review and document the adequacy of the process, including taking any necessary corrective action. Audits independent of line management are not required. Line management is responsible for determining whether reviews conducted by line management or audits conducted by any

organization independent of line management are appropriate. If performed, audits are conducted and documented to verify compliance with design and procurement documents, instructions, procedures, drawings, and inspection and test activities. Where the measures of this part (Part III) are implemented by the same programs, processes, or procedures as the comparable activities of Part II, the audits performed under the provisions of Part II may be used to satisfy the review requirements of this Section (Part III, Section 1.18).

Section 2 Nonsafety-Related SSCs Credited for Regulatory Events

The following criteria apply to fire protection (10 CFR 50.48), anticipated transients without scram (ATWS) (10 CFR 50.62), and the station blackout (SBO) (10 CFR 50.63) SSCs that are not safety-related:

Dominion implements quality requirements for 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," as identified in SAR Chapter 1 and as described in Chapter 9, Section 9.5.

Dominion implements the quality requirements for ATWS equipment in accordance with ~~Generic Letter 85-06, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety Related."~~ Part III, Section 1.

Dominion implements quality requirements for 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."~~ Part III, Section 1.

Part IV Regulatory Commitments

Section 1 NRC Regulatory Guides and Quality Assurance Standards

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the Dominion North Anna Unit 3 QAPD. North Anna Unit 3 Dominion commits to compliance with these standards to the extent described herein. Commitment to a particular Regulatory Guide or other QA standard does not constitute a commitment to the Regulatory Guides or QA standards that may be referenced therein.

1.1 Regulatory Guides

Regulatory Guide 1.8, Rev. 3, May 2000 - Qualification and Training of Personnel for Nuclear Power Plants

Regulatory Guide 1.8 provides guidance that is acceptable to the NRC staff regarding qualifications and training for nuclear power plant personnel. Dominion commits to the applicable regulatory position guidance provided in this regulatory guide during the operational phase of North Anna Unit 3 with the clarifications and exceptions for the applicable regulatory position guidance below.

- Regulatory Position C.2 states that the qualification criteria described in Section 4 of ANSI/ANS-3.1-1993 are acceptable to the NRC staff with some exceptions delineated in subsections that follow the paragraph. Dominion commits to the identified exceptions with the clarification that in lieu of the plant manager approval discussed in paragraphs 2.1.1 and 2.1.3, the following alternative requirement for approval of the equivalents will be used by replacing the second sentence in each of the above paragraphs with the following sentence:

These other factors are to be evaluated on a case-by-case basis and approved and documented by the plant manager or the responsible executive.

- Where reference is made to the training and qualification requirements of ANSI/ASME NQA-1-1983, Dominion commits to the applicable equivalent requirements of NQA-1-1994 as clarified in Part II, Section 2.
- Regarding the qualification requirements for independent review personnel discussed in Regulatory Positions C.2.14 and C.2.15, Dominion commits to the qualification requirements described in Part V, Section 2.2.
- As a further alternative to the selection and qualification requirements for licensed operators contained in ANS-3.1-1993, the requirements of NEI 06-13-A, Rev. 1 may be used for cold-licensing of operators.

Regulatory Guide 1.26, Revision 4, March 2007- Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants

Regulatory Guide 1.26 defines classification of systems and components.

Dominion commits to the applicable regulatory position guidance provided in this regulatory guide for North Anna Unit 3 components outside the scope of the DCD.

~~The requirements for quality group classifications and standards defined by the DCD meet the regulatory guidance of Revision 3.~~

~~**Regulatory Guide 1.26**, Revision 3, February 1976 - Quality Group Classifications and Standards for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants~~

~~Regulatory Guide 1.26 defines classification of systems and components.~~

~~Dominion commits to the applicable regulatory position guidance provided in this regulatory guide for North Anna Unit 3 components within the scope of the DCD with the exceptions described in the ESBWR DCD Table 1.9-21, Table 1.9-21a, and Table 1.9-21b.~~

Regulatory Guide 1.28, Revision 3, August 1985 - Quality Assurance Program Requirements (Design and Construction)

Regulatory Guide 1.28 describes a method acceptable to the NRC staff for complying with the provisions of Appendix B to 10 CFR Part 50 with regard to establishing and implementing the requisite quality assurance program for the design and construction of nuclear power plants.

Dominion identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in the following paragraphs.

- Regulatory Guide 1.28, Rev. 3 identifies that the basic and supplementary requirements included in ANSI/ASME NQA-1-1983 and the NQA-1a-1993 Addenda provide an adequate basis for complying with the pertinent QA requirements of Appendix B during the design and construction phases of nuclear plants. Dominion commits to the basic and supplementary requirements of NQA-1-1994 in lieu of the 1993 edition and addendum of NQA-1 subject to the clarifications contained in Parts II, IV, and V.
- Regulatory Position C.1 addresses the qualification requirements for inspection and test personnel. Dominion commits to these requirements subject to the clarifications identified in Part II, Section 2.7.
- Regulatory Position C.2 addresses the retention of Quality Assurance Records. Dominion commits to these requirements and the record types and retention times listed in Table 1 of the Regulatory Guide as clarified in Part II, Section 17.
- Regulatory Position C.3 addresses requirements for audits. Dominion commits to these requirements as clarified in Part II, Sections 7 and 18.

Regulatory Guide 1.29, Revision 4, March 2007- Seismic Design Classification

Regulatory Guide 1.29 defines systems required to withstand a safe shutdown earthquake (SSE).

Dominion commits to the applicable regulatory position guidance provided in this regulatory guide for North Anna Unit 3 systems outside the scope of the DCD. ~~The requirements for seismic design classification defined by the DCD meet the regulatory guidance of Revision 3.~~

~~**Regulatory Guide 1.20**, Revision 3, September 1978 - Seismic Design Classification~~

~~Regulatory Guide 1.20 defines systems required to withstand a safe shutdown earthquake (SSE).~~

~~Dominion commits to the applicable regulatory position guidance provided in this regulatory guide for North Anna Unit 3 systems within the scope of the DCD with the exceptions described in the ESBWR DCD Table 1.9-21, Table 1.9-21a, and Table 1.9-21b.~~

Regulatory Guide 1.30 (Safety Guide 30), Revision 0, August 1972 - Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment

Regulatory Guide 1.30 found ANSI N45.2.4-1972 to be acceptable in establishing QA requirements for the installation, inspection, and testing of nuclear power plant instrumentation and electric equipment.

In lieu of a commitment to Regulatory Guide 1.30, Dominion commits to the QA requirements of NQA-1-1994, Subpart 2.4 (ANSI/IEEE Std. 336-1985), IEEE Standard Installation, Inspection, and Testing Requirements for Power, Instrumentation, and Control Equipment at Nuclear Facilities, as clarified in Part II, Section 10.

Regulatory Guide 1.33, Revision 2, February 1978 - Quality Assurance Program Requirements (Operations)

Regulatory Guide 1.33 describes a method acceptable to the NRC staff for complying with the Commission's regulations with regard to overall quality assurance program requirements for the operational phase of nuclear power plants.

Dominion identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in the following paragraphs.

- Regulatory Guide 1.33 identifies that the overall quality assurance program requirements for the operational phase that are included in ANSI N18.7-1976/ANS-3.2 are acceptable to the NRC staff and provide an adequate basis for complying with the quality assurance program requirements of Appendix B to 10 CFR Part 50, subject to the clarifications and supplementary guidance provided in the regulatory positions. In lieu of a commitment to ANSI N18.7-1976/ANS-3.2, Dominion commits to implementing the QA program requirements contained in NQA-1-1994 as clarified in the QAPD as well as the additional requirements specified in the QAPD.

- In meeting the intent of Regulatory Position C.1, Dominion prepares and controls procedures for the operational phase of the plant as described in Part II, Sections 5 and 6, and Part V, Section 3. The guidance of Reg. Guide 1.33, Appendix A is utilized to help determine the types of activities that affect the quality of safe operation of SSCs subject to the QAPD and, thus, are to be performed in accordance with approved procedures.
- In meeting the intent of Regulatory Position C.2, Dominion's commitment to Regulatory Guides governing QA is specified in Parts II, IV, and V.
- In meeting the intent of Regulatory Position C.3, Dominion describes the requirements for independent review of technical specification changes and license amendments by the IRC in Part V, Section 2.2.
- In meeting the intent of Regulatory Position C.4, Dominion describes the internal audit function, scheduling, and frequency in Part II, Section 18. Program elements for corrective action are included in each audit. The audit scheduling process takes into consideration the need for increased auditing in areas that indicate ineffective performance.
- In meeting the intent of Regulatory Position C.5, Dominion has included comparable requirements in the QAPD to govern the operating phase QA program.

Regulatory Guide 1.37, Revision 1, March 2007 - Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants

Regulatory Guide 1.37 provides guidance on specifying water quality and precautions related to the use of alkaline cleaning solutions and chelating agents.

Dominion commits to the applicable regulatory position guidance provided in this regulatory guide for North Anna Unit 3 during the construction and preoperational phase of the plant as clarified in Part II, Section 13.

Regulatory Guide 1.38, Revision 2, May 1977 - Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants

Regulatory Guide 1.38 provides guidance on assuring the quality of items to be used in safety-related applications of a nuclear power plant during shipping, storage, and handling of items including provisions for packaging, receipt, and maintenance while in storage. This Regulatory Guide identified that the provisions of ASME N45.2.2-1972 are acceptable to the NRC staff subject to certain specific regulatory positions.

In lieu of a commitment to Regulatory Guide 1.38, Dominion commits to the QA requirements of NQA-1-1994, Subpart 2.2, as clarified in Part II, Section 13.

Regulatory Guide 1.39, Revision 1, October 1976 - Housekeeping Requirements for Water-Cooled Nuclear Power Plants

Regulatory Guide 1.39 found the requirements on the control of work activities, conditions, and environments at water-cooled nuclear power plant sites in ANSI N45.2.3-1973 to be acceptable to the NRC staff with certain provisions.

In lieu of a commitment to Regulatory Guide 1.39, Dominion commits to the QA requirements of NQA-1-1994, Subpart 2.3, as clarified in Part II, Section 13.

Regulatory Guide 1.54, Revision 1, July 2000 - Service Level I, II, and III Protective Coatings applied to Nuclear Power Plants

Regulatory Guide 1.54 provides guidance on the application of protective coatings within nuclear power plants to protect surfaces from corrosion, contamination from radionuclides, and for wear protection. Dominion commits to the guidance provided in this Regulatory Guide.

Regulatory Guide 1.94, Revision 1, April 1976 - Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants

Regulatory Guide 1.94 found that the requirements and guidelines in ANSI N45.2.5-1974 for installation, inspection, and testing of structural concrete and structural steel during the construction phase of nuclear power plants are generally acceptable to the NRC staff subject to certain specific regulatory positions.

In lieu of a commitment to Regulatory Guide 1.94, Dominion commits to the requirements of NQA-1-1994, Subpart 2.5, subject to the clarifications in the following paragraphs.

- Where important to safety structures other than concrete reactor vessels and containments are constructed or modified, other appropriate industry codes and standards may be invoked in place of ACI 359 as specified by the responsible design organization so long as they meet any current licensing commitments.
- With regard to Section 7.7, "Curing," ASTM C 1315 is added to the first paragraph as another applicable standard for test methods for curing compounds.

Regulatory Guide 1.116, Revision 0-R, June 1976, Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems

Regulatory Guide 1.116 found the requirements for installation, inspection, and testing of mechanical equipment and systems of water-cooled nuclear power plants that are included in ANSI N45.2.8 to be acceptable to the NRC staff subject to certain specific regulatory positions.

In lieu of a commitment to Regulatory Guide 1.116, Dominion commits to the requirements of NQA-1-1994, Subpart 2.8 as identified in Part II, Section 10.

1.2 Standards

ASME NQA-1-1994 Edition - Quality Assurance Requirements for Nuclear Facility Applications

Dominion commits to NQA-1-1994, Parts ~~I and II~~, II, and III, as described in ~~the foregoing sections~~ Parts II, IV, and V of this document.

Nuclear Information and Records Management Association, Inc. (NIRMA) Technical Guides (TGs)

Dominion commits to NIRMA TGs as described in Part II, Section 17.

Part V Additional Quality Assurance and Administrative Controls for the Plant Operational Phase

Dominion includes the requirements of Part V that follow when establishing the necessary measures and governing procedures for the operations phase of the plant.

Section 1 Definitions

Dominion uses the definitions of terms as provided in Section 4 of the Introduction of NQA-1-1994 in interpreting the requirements of NQA-1-1994 and the other standards to which the QAPD commits. In addition, definitions are provided for the following terms not covered in NQA-1-1994:

administrative controls: rules, orders, instructions, procedures, policies, practices and designations of authority and responsibility

experiments: performance of plant operations carried out under controlled conditions in order to establish characteristics or values not previously known

nuclear power plant: any plant using a nuclear reactor to produce electric power, process steam or space heating

on-site operating organization: on-site personnel concerned with the operation, maintenance and certain technical services

operating activities: work functions associated with normal operation and maintenance of the plant, and technical services routinely assigned to the on-site operating organization

operational phase: that period of time during which the principal activity is associated with normal operation of the plant. This phase of plant life is considered to begin formally with commencement of initial fuel loading, and ends with plant decommissioning

review: a deliberately critical examination, including observation of plant operation, evaluation of assessment results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions

supervision: direction of personnel activities or monitoring of plant functions by an individual responsible and accountable for the activities they direct or monitor

surveillance testing: periodic testing to verify that safety related structures, systems, and components continue to function or are in a state of readiness to perform their functions

system: an integral part of nuclear power plant comprising components which may be operated or used as a separate entity to perform a specific function

Section 2 Review of Activities Affecting Safe Plant Operation

2.1 Onsite Operating Organization Review

The Dominion onsite organization employs reviews, both periodic and as situations demand, to evaluate plant operations and plan future activities. The important elements of the reviews are documented and subjects of potential concern for the independent review described below are brought to the attention of the Executive Management position responsible for the site. The reviews are part of the normal duties of plant supervisory personnel in order to provide timely and continuing monitoring of operating activities in order to assist the executive management position responsible for operations in keeping abreast of general plant conditions and to verify that day-to-day operations are conducted safely in accordance with the established administrative controls. The Executive Management position responsible for the site ensures the timely referral of the applicable matters discussed in the reviews to appropriate management and independent reviewers.

2.2 Independent Review

Activities occurring during the operational phase shall be independently reviewed on a periodic basis. The independent review program shall be functional prior to initial core loading.

The Independent Review Committee (IRC) is assigned independent review responsibilities.

- The IRC reports to the CNO.
- The IRC is composed of no less than 5 persons and no more than a minority of members are from the on-site operating organization.

For example, at least 3 of the 5 members must be from off-site if there are 5 members on the committee. A minimum of the chairman or alternative chairman and 2 members must be present for all meetings.

- During the period of initial operation, meetings are conducted no less frequently than once per calendar quarter. Afterwards meetings are conducted no less than twice a year.
- Results of the meeting are documented and recorded.
- Consultants and contractors are used for the review of complex problems beyond the expertise of the IRC.
- Persons on the IRC are qualified as follows:
 - Chairman of the IRC
 - Education:
 - Baccalaureate in engineering or related science

– Minimum experience:

- Six (6) years combined managerial and technical support

•• IRC members

– Education:

- Baccalaureate in engineering or related science for those IRC members who are required to review problems in

- ∞ nuclear power plant operations,

- ∞ nuclear engineering,

- ∞ chemistry and radiochemistry,

- ∞ metallurgy,

- ∞ nondestructive testing,

- ∞ instrumentation and control,

- ∞ radiological safety,

- ∞ mechanical engineering, and electrical engineering.

- High school diploma for those members who are required to review problems in administrative control and quality assurance practices, training, and emergency plans and related procedures and equipment.

– Minimum experience:

- Five (5) years experience in their own area of responsibility (nuclear power plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, nondestructive testing, instrumentation and control, radiological safety, mechanical engineering, and electrical engineering, administrative control and quality assurance practices, training, and emergency plans and related procedures and equipment).

The independent review function performs the following:

- Reviews proposed changes to the facility as described in the safety analysis report (SAR). The IRC also verifies that changes do not adversely affect safety and if a technical specification change or NRC review is required.

- Reviews proposed tests and experiments not described in the SAR. Changes to proposed tests and experiments not described in the SAR that do require a technical specification change must be reviewed by the IRC prior to NRC submittal and implementation.
- Reviews proposed technical specification changes and license amendments relating to nuclear safety prior to NRC submittal and implementation, except in those cases where the change is identical to a previously approved change.
- Reviews violations, deviations, and events that are required to be reported to the NRC. This review includes the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- Reviews any matter related to nuclear safety that is requested by the CNO, the Management Executive position responsible for the site, or any IRC member.
- Reviews corrective actions for significant conditions adverse to quality.
- Reviews the adequacy of the audit program every 24 months.

Section 3 Operational Phase Procedures

The following is a description of the various types of procedures used by Dominion to govern the design, operation, and maintenance of its nuclear generating plants. Dominion follows the guidance of Appendix A to Regulatory Guide 1.33 in identifying the types of activities that should have procedures or instructions to control the activity. Each procedure shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision, but need not provide a complete description of the system or plant process.

3.1 Format and Content

Procedure format and content may vary from one location to the other. However, procedures include the following elements as appropriate to the purpose or task to be described.

• Title/Status

Each procedure is given a title descriptive of the work or subject it addresses, and includes a revision number and/or date and an approval status.

•• Purpose/Statement of Applicability/Scope

The purpose for which the procedure is intended is clearly stated (if not clear from the title). The systems, structures, components, processes or conditions to which the procedure applies are also clearly described.

•• References

Applicable references, including reference to appropriate Technical Specifications, are required. References are included within the body of the procedure when the sequence of steps requires other tasks to be performed (according to the reference) prior to or concurrent with a particular step.

•• Prerequisites/Initial Conditions

Prerequisites/initial conditions identify those independent actions or procedures that must be accomplished and plant conditions which must exist prior to performing the procedure. A prerequisite applicable to only a specific portion of a procedure is so identified.

•• Precautions

Precautions alert the user to those important measures to be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation during performance of the procedure. Cautionary notes applicable to specific steps are included in the main body of the procedure and are identified as such.

•• Limitations and Actions

Limitations on the parameters being controlled and appropriate corrective measures to return the parameter to the normal control band are specified.

•• Main Body

The main body of the procedure contains the step-by-step instructions in the degree of detail necessary for performing the required function or task.

•• Acceptance Criteria

The acceptance criteria provide the quantitative or qualitative criteria against which the success or failure (as of a test-type activity) of the step or action would be judged.

•• Checklists

Complex procedures utilize checklists which may be included as part of the procedure or appended to it.

3.2 Procedure Types

Administrative Control Procedures

These include administrative procedures, directives, policies, standards, and similar documents that control the programmatic aspects of facility activities. These administrative documents ensure that the requirements of regulatory and license commitments are implemented. Several levels of administrative controls are applied ranging from those affecting the entire Company to those prepared at the implementing group level. These documents establish responsibilities, interfaces, and standard methods (rules of practice) for implementing programs. In addition to the administrative controls described throughout this QAPD, instructions governing the following activities are provided:

• Operating Orders/Procedures

Instructions of general and continuing applicability to the conduct of business to the plant staff are provided. Examples where these are applied include, but are not limited to, job turnover and relief, designation of confines of control room, definition of duties of operators and others, transmittal of operating data to management, filing of charts, limitations on access to certain areas and equipment, shipping and receiving instructions. Provisions are made for periodic review and updating of these documents, where appropriate.

• Special Orders

Management instructions, which have short-term applicability and require dissemination, are issued to encompass special operations, housekeeping, data taking, publications and their distribution, plotting process parameters, personnel actions, or other similar matters. Provisions are made for periodic review, updating, and cancellation of these documents, where appropriate.

• **Plant Security and Visitor Control**

Procedures or instructions are developed to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant. Information concerning specific design features and administrative provisions of the plant security program is confidential and thus accorded limited distribution. The security and visitor control procedures consider, for example, physical provisions, such as: fences and lighting; lock controls for doors, gates and compartments containing sensitive equipment; and provisions for traffic and access control. Administrative provisions, such as: visitor sign-in and sign-out procedures; escorts and badges for visitors; emphasis on inspection, observation and challenging of strangers by operating crews; and a program of pre-employment screening for potential employees are also considered.

• **Temporary Procedures**

Temporary procedures may be used to direct operations during testing, refueling, maintenance, and modifications to provide guidance in unusual situations not within the scope of the normal procedures. These procedures ensure orderly and uniform operations for short periods when the plant, a system, or a component of a system is performing in a manner not covered by existing detailed procedures or has been modified or extended in such a manner that portions of existing procedures do not apply. Temporary Procedures include designation of the period of time during which they may be used and are subject to the procedure review process as applicable.

Engineering Procedures

These documents provide instructions for the preparation of engineering documents, engineering analysis, and implementation of engineering programs. This includes activities such as designs; calculations; fabrication, equipment, construction, and installation specifications; drawings; analysis and topical reports; and testing plans or procedures. They include appropriate references to industry codes and standards, design inputs, and technical requirements.

Installation Procedures

These documents provide instructions for the installation of components generally related to new construction and certain modification activities. They include appropriate reference to industry standards, installation specifications, design drawings, and supplier and technical manuals for the performance of activities. These documents include provisions, such as hold or witness points, for conducting and recording results of required inspections or tests. These documents may include applicable inspection and test instructions subject to the requirements for test and inspection procedures below.

System Procedures

These documents contain instructions for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation, and other instructions appropriate for operations of systems related to the safety of the plant. Separate procedures may be developed for correcting off-normal conditions for those events where system complexity may lead to operator uncertainty. Appropriate procedures will also be developed for the fire protection program.

Start-up Procedures

These documents contain instructions for starting the reactor from cold or hot conditions and establishing power operation. This includes documented determination that prerequisites have been met, including confirmation that necessary instruments are operable and properly set; valves are properly aligned, necessary system procedures, tests and calibrations have been completed; and required approvals have been obtained.

Shutdown Procedures

These documents contain guidance for operations during controlled shutdown and following reactor trips, including instructions for establishing or maintaining hot shutdown/standby or cold shutdown conditions, as applicable. The major steps involved in shutting down the plant are specified, including instructions for such actions as monitoring and controlling reactivity, load reduction and cooldown rates, sequence for activating or deactivating equipment, requirements for prompt analysis for causes of reactor trips or abnormal conditions requiring unplanned controlled shutdowns, and provisions for decay heat removal.

Power Operation and Load Changing Procedures

These documents contain instructions for steady-state power operation and load changing. These type documents include, as examples, provisions for use of control rods, chemical shim, coolant flow control, or any other system available for short-term or long-term control of reactivity, making deliberate load changes, responding to unanticipated load changes, and adjusting operating parameters.

Process Monitoring Procedures

These documents contain instructions for monitoring performance of plant systems to assure that core thermal margins and coolant quality are maintained in acceptable status at all times, that integrity of fission product barriers is maintained, and that engineered safety features and emergency equipment are in a state of readiness to keep the plant in a safe condition if needed. Maximum and minimum limits for process parameters are appropriately identified. Operating procedures address the appropriate nature and frequency of this monitoring.

Fuel Handling Procedures

These documents contain instructions for core alterations, accountability of fuel and partial or complete refueling operations that include, for example, continuous monitoring of neutron flux

throughout core loading, periodic data recording, audible annunciation of abnormal flux increases, and evaluation of core neutron multiplication to verify safety of loading increments. Procedures are also provided for receipt and inspection of new fuel, and for fuel movements in the spent fuel storage areas. Fuel handling procedures include prerequisites to verify the status of systems required for fuel handling and movement; inspection of replacement fuel and control rods; designation of proper tools, proper conditions for spent fuel movement, proper conditions for fuel cask loading and movement; and status of interlocks, reactor trip circuits and mode switches. These procedures provide requirements for refueling, including proper sequence, orientation and seating of fuel and components, rules for minimum operable instrumentation, actions for response to fuel damage, verification of shutdown margin, communications between the control room and the fuel handling station, independent verification of fuel and component locations, criteria for stopping fuel movements, and documentation of final fuel and component serial numbers (or other unique identifiers) and locations.

Maintenance Procedures

These documents contain instructions in sufficient detail to permit maintenance work to be performed correctly and safely, and include provisions, such as hold or witness points, for conducting and recording results of required inspections or tests. These documents may include applicable inspection or test instructions subject to the requirements for test and inspection procedures below. Appropriate referencing to other procedures, standards, specifications, or supplier manuals is provided. When not provided through other documents, instructions for equipment removal and return to service, and applicable radiation protection measures (such as protective clothing and radiation monitoring) will be included. Additional maintenance procedure requirements are addressed in NQA-1-1994, Subpart 2.18, Section 2.2, Procedures.

Radiation Control Procedures

These documents contain instructions for implementation of the radiation control program requirements necessary to meet regulatory commitments, including acquisition of data and use of equipment to perform necessary radiation surveys, measurements and evaluations for the assessment and control of radiation hazards. These procedures provide requirements for monitoring both external and internal exposures of employees, utilizing accepted techniques; routine radiation surveys of work areas; effluent and environmental monitoring in the vicinity of the plant; radiation monitoring of maintenance and special work activities, and for maintaining records demonstrating the adequacy of measures taken to control radiation exposures to employees and others.

Calibration and Test Procedures

These documents contain instructions for periodic calibration and testing of instrumentation and control systems, and for periodic calibration of measuring and test equipment used in activities affecting the quality of these systems. These documents provide for meeting surveillance requirements and for assuring measurement accuracy adequate to keep safety-related parameters within operational and safety limits.

Chemical and Radiochemical Control Procedures

These documents contain instructions for chemical and radiochemical control activities and include: the nature and frequency of sampling and analyses; instructions for maintaining coolant quality within prescribed limits; and limitations on concentrations of agents that could cause corrosive attack, foul heat transfer surfaces, or become sources of radiation hazards due to activation. These documents also provide for the control, treatment and management of radioactive wastes, and control of radioactive calibration sources.

Emergency Operating Procedures

These documents contain instructions for response to potential emergencies so that a trained operator will know in advance the expected course of events that will identify an emergency and the immediate actions that should be taken in response. Format and content of emergency procedures are based on regulatory and Owner's Group(s) guidance that identify potential emergency conditions and generally require such procedures to include a title, symptoms to aid in identification of the nature of the emergency, automatic actions to be expected from protective systems, immediate operator actions for operation of controls or confirmation of automatic actions, and subsequent operator actions to return the reactor to a normal condition or provide for a safe extended shutdown period under abnormal or emergency conditions.

Emergency Plan Implementing Procedures

These documents contain instructions for activating the Emergency Response Organization and facilities, protective action levels, organizing emergency response actions, establishing necessary communications with local, state and federal agencies, and for periodically testing the procedures, communications and alarm systems to assure they function properly. Format and content of such procedures are such that requirements of each facility's NRC approved Emergency Plan are met.

Test and Inspection Procedures

These documents provide the necessary measures to assure quality is achieved and maintained for the nuclear facilities. The instructions for tests and inspections may be included within other procedures, such as installation and maintenance procedures, but will contain the objectives, acceptance criteria, prerequisites for performing the test or inspection, limiting conditions, and appropriate instructions for performing the test or inspection, as

applicable. These procedures also specify any special equipment or calibrations required to conduct the test or inspection and provide for appropriate documentation and evaluation by responsible authority to assure test or inspection requirements have been satisfied. Where necessary, hold or witness points are identified within the procedures and require appropriate approval for the work to continue beyond the designated point. These procedures provide for recording the date, identification of those performing the test or inspection, as-found condition, corrective actions performed (if any), and as-left condition, as appropriate for the subject test or inspection.

Section 4 Control of Systems and Equipment in the Operational Phase

Permission to release systems and equipment for maintenance or modification is controlled by designated operating personnel and documented. Measures, such as installation of tags or locks and releasing stored energy, are used to ensure personnel and equipment safety. When entry into a closed system is required, Dominion has established control measures to prevent entry of extraneous material and to assure that foreign material is removed before the system is reclosed.

Administrative procedures require the designated operating personnel to verify that the system or equipment can be released and determine the length of time it may be out of service. In making this determination, attention is given to the potentially degraded degree of protection where one subsystem of a redundant safety system is not available for service. Conditions to be considered in preparing equipment for maintenance include, for example: shutdown margin; method of emergency core cooling; establishment of a path for decay heat removal; temperature and pressure of the system; valves between work and hazardous material; venting, draining and flushing; entry into closed vessels; hazardous atmospheres; handling hazardous materials; and electrical hazards.

When systems or equipment are ready to be returned to service, designated operating personnel control placing the items in service and document its functional acceptability. Attention is given to restoration of normal conditions, such as removal of jumpers or signals used in maintenance or testing, or actions such as returning valves, breakers or switches to proper start-up or operating positions from "test" or "manual" positions. Where necessary, the equipment placed into service receives additional surveillance during the run-in period.

Independent verifications, where appropriate, are used to ensure that the necessary measures have been implemented correctly. The minimum requirements and standards for using independent verification are established in company documents.

Section 5 Plant Maintenance

Dominion establishes controls for the maintenance or modification of items and equipment subject to the QAPD to ensure quality at least equivalent to that specified in original design bases and requirements, such that safety-related structures, systems and components are maintained in a manner that assures their ability to perform their intended safety function(s). Maintenance activities (both corrective and preventive) are scheduled and planned so as not to unnecessarily compromise the safety of the plant.

In establishing controls for plant maintenance, Dominion commits to compliance with NQA-1-1994, Subpart 2.18, with the following clarifications:

- Where Subpart 2.18 refers to the requirements of ANS-3.2, it shall be interpreted to mean the applicable standards and requirements established within the North Anna 3 QAPD
- Section 2.3 requires cleanliness during maintenance to be in accordance with Subpart 2.1. The commitment to Subpart 2.1 is described in the QAPD, Part II, Section 13.2.