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CHAPTER 17 QUALITY ASSURANCE

17.1 QUALITY ASSURANCE DURING THE DESIGN AND CONSTRUCTION PHASES

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

PTN COL 17.5-1 The COL Application development through and including COL issuance was conducted in accordance with the requirements of an FPL-approved quality assurance program, which meets the requirements of 10 CFR Part 50 Appendix B and complies with the applicable criteria of ASME NQA-1, 1994. The application of these requirements to the COL Application development activities is defined in the FPL Fleet QA Topical Report, FPL-1.

COL Application development and site characterization services were procured in accordance with the existing FPL Quality Assurance Program requirements from Bechtel Power Corporation. Bechtel Power Corporation performed their assigned tasks in accordance with the requirements of their own quality assurance program that was reviewed and approved by FPL for conduct of safety-related work. The process of collection, review, and analysis of specific data for site characterization was performed under the Bechtel Nuclear Quality Assurance Manual (NQAM) as described in the Bechtel Turkey Point COL Project Quality Assurance Program Plan (QAPP).

FPL maintains oversight of the contractor activities performed in support of the COL Application development contract in accordance with its existing 10 CFR Part 50 Appendix B program as described in the FPL Quality Assurance Topical Report, FPL-1. FPL oversight of the COL development activities is provided through conducting quality assurance audits and surveillances of the contractor activities and processes, and by direct participation in COL development activities. FPL provided site-specific applicant input and review of COL Application content.

Upon issuance of a COL, the FPL New Nuclear Projects Quality Assurance Program Description FPL-2 (QAPD) described in Section 17.5 will be used for activities related to the remaining portion of the design, construction, and operational phases of the new nuclear facilities.

The Turkey Point Units 6 & 7 safety-related design activities conducted under the program described in Section 17.1 are performed in conformance with RG 1.28,

Revision 3. This is the only identified applicable quality assurance related Regulatory Guide for the program in place prior to COL receipt.

17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE

This section of the referenced DCD is incorporated by reference with no departures or supplements.

17.3 QUALITY ASSURANCE DURING DESIGN, PROCUREMENT, FABRICATION, INSPECTION, AND/OR TESTING OF NUCLEAR POWER PLANT ITEMS

This section of the referenced DCD is incorporated by reference with no departures or supplements.

17.4 DESIGN RELIABILITY ASSURANCE PROGRAM

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

STD SUP 17.4-1 The quality assurance requirements for non-safety related SSCs within the scope of D-RAP is in accordance with the Quality Assurance Program Description (QAPD), Part III.

STD DEP 1.1-1

1-1 17.5 QUALITY ASSURANCE PROGRAM DESCRIPTION — NEW LICENSE APPLICANTS

PTN COL 17.5-1 STD COL 17.5-2 STD COL 17.5-4 STD COL 17.5-8

The quality assurance program in place during the design, construction, and operations phases is described in the QAPD, which is maintained as a separate document. The QAPD is incorporated by reference (see Table 1.6-201). This QAPD is based on NEI 06-14A, "Quality Assurance Program Description" (Reference 203).

Conformance statements for QA-related Regulatory Guides (including Regulatory Guides 1.28, 1.30, 1.33, 1.38, 1.39, 1.94, and 1.116) are provided in Appendix 1AA. While many Regulatory Guide positions can be identified as applicable to the scope of work identified and addressed by the DCD and others can be identified as applicable to the scope of work identified and addressed by the COLA, some QA guidance related positions could be accomplished by either scope of work and thus be addressed in either the DCD or the COLA. These positions are primarily dependent on who performs the work. The DCD conformance statement indicates an exception to apply NQA-1. The COLA identifies an exception to apply NQA-1. Per DCD Section 17.3, WEC work performed up to March 15, 2007 applied a 1991 version of the standard. A 1994 version of the standard is applied for work performed after that date by WEC. If the work is performed under the applicant's COL program, the 1994 version of NQA-1 identified in the COLA QAPD is applied. Thus, DCD scope (identified in DCD Appendix 1A) and "remaining scope" differentiate the application of the guidance identified in these Regulatory Guides.

PTN COL 17.5-1 The QAPD is the Units 6 & 7 Quality Assurance Program Description.

| PTN COL 17.5-1 | Table 13.4-201 provides milestones for operational quality assurance program |
|----------------|--|
| STD COL 17.5-2 | |
| STD COL 17.5-4 | implementation. |
| STD COL 17.5-8 | |

PTN COL 17.5-1 The quality assurance program in place before implementation of the QAPD is described in Section 17.1.

STD DEP 1.1-1 17.6 MAINTENANCE RULE PROGRAM

STD SUP 17.6-1This section incorporates by reference NEI 07-02A, "Generic FSAR TemplateSTD COL 3.8-5Guidance for Maintenance Rule Program Description for Plants Licensed Under
10 CFR Part 52," (Reference 205) with the following supplemental information.
See Table 1.6-201.

 Table 13.4-201 provides milestones for maintenance rule program implementation.

The text of the template provided in NEI 07-02A is generically numbered as "17.X." When the template is incorporated by reference into this FSAR, section numbering is changed from "17.X" to "17.6."

STD SUP 17.6-1 Descriptions of the programs listed in Subsection 17.6.3 of NEI 07-02A are provided in the following FSAR chapters/sections:

The maintenance rule program (Section 17.6)

The quality assurance program (Section 17.5)

Inservice inspection program (Sections 5.2 and 6.6)

Inservice testing program (Section 3.9)

The technical specifications surveillance test program (Chapter 16)

STD SUP 17.6-2 Condition monitoring of underground or inaccessible cables is incorporated into the maintenance rule program. The cable condition monitoring program incorporates lessons learned from industry operating experience, addresses regulatory guidance, and utilizes information from detailed design and procurement documents to determine the appropriate inspections, tests and monitoring criteria for underground and inaccessible cables within the scope of the maintenance rule (i.e., 10 CFR 50.65). The program takes into consideration Generic Letter 2007-01.

STD DEP 1.1-1 17.7 COMBINED LICENSE INFORMATION ITEMS

Section 17.5 of the referenced DCD is incorporated by reference with the following departures and/or supplements.

PTN COL 17.5-1 This COL Item is addressed in Sections 17.1 and 17.5.

- STD COL 17.5-2 This COL Item is addressed in Section 17.5.
- STD COL 17.5-4 This COL Item is addressed in Section 17.5.
- STD COL 17.5-8 This COL Item is addressed in Section 17.5.

STD DEP 1.1-1 17.8 REFERENCES

Section 17.6 of the referenced DCD is incorporated by reference with the following departures and/or supplements.

- 201. Not used.
- 202. Not used.
- 203. Nuclear Energy Institute, Technical Report NEI 06-14A, "Quality Assurance Program Description," Revision 7, August 10, 2010.
- 204. Not used.
- 205. Nuclear Energy Institute, "Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52," NEI 07-02A, Revision 0.