Quality Assurance Program Description

Title: Comanche Peak Nuclear Power Plant Units 3 and 4 Quality Assurance Program Description

Process/Program Owner: *Manager, NuBuild Quality Assurance*

	Version Number	Effective Date
	Revision 2	**5/31/2011**

Revision Summary

Revision 1:

- Updated in accordance with NEI 06-14A Revision 7
- Made changes to address Luminant Organizational structure changes

Revision 2:
Changed numbering in document to page numbers only
Updated in accordance with NEI 06-14 Revision 9

- PART II Section 1 changed to address changes in Luminant Organization
- PART II Section 2.7 Independent Review moved to PART V Section 2.2
- PART IV updated to reflect Luminant commitments and exceptions to NRC Regulatory Guides
- Added PART V to QAPD
    - SECTION 3.2 “Power Operations and Load Change Procedures” removed requirements for flow control as the US APWR has no such system

Updated QAPD to adopt NEI 06-14A Revision 7.
Corrected inconsistencies among references.
PART IV changed to replace NEI QAPD template text with plant-specific conformance discussions

Prepared By/Date:

_____ /_____
Manager, NuBuild Quality Assurance

Reviewed By/Date:	Approved By/Date:
_____/_____ *Manager, NuBuild Quality Assurance*	_____/_____ *Senior Vice President & Chief Nuclear Officer*

Luminant Generation Company, LLC

POLICY STATEMENT

Luminant Generation Company LLC (Luminant), maintains full responsibility Comanche Peak Nuclear Power Plant, Units 3 and 4 (CPNPP 3 and 4) and shall design, procure, construct and operate the nuclear plants 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 CPNPP 3 and 4 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 CPNPP 3 and 4 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 Luminant'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 CPNPP 3 and 4 QAP.

Signed _____

Senior Vice President & Chief Nuclear Officer
Luminant Generation Company, LLC

Date

TABLE OF CONTENTS

PART I INTRODUCTION

SECTION 1 GENERAL

The Comanche Peak Nuclear Power Plant Units 3 and 4 (CPNPP 3 and 4) Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for design, construction, pre-operation, and operations activities conducted by or for Luminant. 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 CPNPP 3 and 4 activities will be developed prior to commencement of those activities. Policies establish high-level responsibilities and authority for carrying out important administrative functions which are outside the scope of the QAPD. Procedures establish practices for certain activities which are common to all Luminant 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 design, construction, pre-operation, and operations activities affecting the quality and performance of safety-related structures, systems, and components, including, but not limited to:

Designing	Storing	Operating
Procuring	Constructing	Maintaining
Fabricating	Erecting	Repairing
Cleaning	Installing	Modifying
Handling	Inspecting	Refueling
Shipping	Testing	Training
Receiving	Startup	Decommissioning

Pre-operational activities (including ITAAC)

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 Luminant is to assure a high degree of availability and reliability of the nuclear plants 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 I Section 1.4 apply to select terms as used in this document.

PART II QAPD DETAILS

SECTION 1 ORGANIZATION

This section describes the Comanche Peak Nuclear Power Plant Units 3 and 4 (CPNPP 3 and 4) organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes offsite and onsite functions for Luminant 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.

The Senior Vice President & Chief Nuclear Officer is responsible to size the Quality Assurance organization commensurate with the duties and responsibilities assigned.

During all phases, managers of all departments are responsible for the development and implementation of procedures and the training of personnel, as required, to accomplish their roles with respect to quality.

Luminant is responsible for new nuclear plant licensing, engineering, procurement, construction, startup, and operations development activities. Several organizations within Luminant implement and support the QAPD. These organizations include, but are not limited to Engineering and Technical Services, Procurement Services, Construction Management, Operations Support, Administrative Services, and Quality Assurance.

Design, engineering, environmental, and other services are provided to Luminant by its approved contractors in accordance with their approved QAPDs. Contracts between Luminant and its contractors will extend the quality assurance requirements described in this document to all applicable contractors and subcontractors.

The following sections describe the reporting relationships, functional responsibilities, and authorities for organizations implementing and supporting the Luminant QAPD. The Luminant organization is shown in Figures II.1, II.2, and II.3 of this section.

1.1 Chief Executive Officer (CEO)

The Chief Executive Officer (CEO) is responsible for all aspects of design, construction, and operation of Luminant's nuclear plants. The CEO reports to the Luminant Board of Managers and to the parent company, Energy Future Holdings Corp. (EFH), with respect to all matters. The CEO is responsible through service contracts to Comanche Peak Nuclear Power Company (CPNPC) for the construction and operation of CPNPP Units 3 and 4. The CEO is also responsible for all technical and administrative support activities provided by Luminant and contractors. The CEO directs the Senior Vice President & Chief Nuclear Officer (SVP/CNO), the SVP of Development, the CEO of Construction and the Chief Commercial Officer (CCO) with regard to CPNPP 3 and 4. The CEO is also responsible for support provided to CPNPP Units 3 & 4 by other corporate entities. These entities include

but are not limited to, Accounting, Finance, Procurement and Purchasing, Human Resources, Environmental Legal, Information Technology Support, and Real Estate, etc.

1.2 Senior Vice President & Chief Nuclear Officer (SVP/CNO)

The SVP/CNO is the Luminant executive responsible for the safe, reliable, and efficient operation of Luminant nuclear plants. The SVP/CNP has overall responsibility for the implementation of the QAPD. The SVP/CNO will support CPNPP Units 3 and 4 development and construction and will direct the Director NuBuild Project and the Manager NuBuild QA. The SVP/CNO also directs the Site Vice President, Vice President, Nuclear Engineering and Support, Director, Oversight and Regulatory Affairs, and the executive responsible for fuel management. The SVP/CNP is responsible for the overall nuclear organization and ensuring support for corporate related functions i.e., finance human resources, information technology, etc.

1.2.1 Site Vice President

The Site Vice President reports to the SVP/CNO and is responsible for the operation and maintenance of CPNPP Units 3 and 4. The Site VP directs the Plant Manager, Director of Performance Improvement and Manager, Plant Support Nuclear and the Manager of Nuclear Training, The Site VP is responsible for the overall operation and maintenance of the units and operations and maintenance support functions of the organization e.g., procedures, testing, work control, etc. The Site VP also has responsibility for the procurement and material control and documentation.

1.2.2 Vice President of Nuclear Engineering and Support

The Vice President, Nuclear Engineering and Support reports to the SVP/CNO and is responsible for all engineering and technical support for the day to day operation of the units. He is also responsible for Design Control administrative support, document control, and other special processes for the units. The VP of Engineering and Support directs the Director of Site Engineering and the Director of Engineering Support.

1.3 Chief of Construction

Construction is responsible for engineering, construction and procurement during the construction phase of CPNPP Units 3 and 4. During the licensing phase, the Chief of Construction is responsible for construction planning and scheduling. The Chief of Construction is also responsible for system testing and will turn over systems, components and other activities to the site operations organization during the transition from construction to operations. The Chief of Construction reports to the Luminant CEO of Construction, but the Development Manager is responsible to the SVP/CNO for all quality related activities.

1.3.1 Development Manager

The Development Manager provides corporate support such as financing, contract structuring, and commercial support. The Development Manager reports to the SVP of Development who is a direct report to the Luminant CEO but is responsible to the SVP/CNO for all quality related activities.

1.4 Director NuBuild Project

The Director of NuBuild is responsible for the site nuclear development (NuBuild) project team for CPNPP Units 3 and 4. The Director NuBuild Project reports to the SVP/CNO and directs the licensing, site planning and site development of CPNPP 3 and 4. The Director NuBuild Project is responsible for coordinating the new nuclear plant licensing and development of the operating and support organization requirements and planning necessary for the new units. The Director NuBuild Project is also responsible for implementation of quality assurance requirements in the areas specified by the QAPD for NuBuild activities.

1.5 Quality Assurance

The Quality Assurance Organization is responsible for independently planning and performing activities to verify the development and effective implementation of the QAPD described in this document for NuBuild activities including, but not limited to engineering, licensing, document control, corrective action program and procurement that support new nuclear plant generation.

1.5.1 Manager, NuBuild Quality Assurance

The Manager, NuBuild Quality Assurance reports to the SVP/CNO and is responsible for developing and maintaining the Luminant QAPD, evaluating compliance to the programs, and managing the QA organization resources. The Manager Nubuild Quality Assurance organization is responsible for independently planning and performing activities to verify effective implementation of the QAPD, including but not limited to new nuclear plant activities in engineering, licensing, document control, corrective action program, and procurement. This position is responsible for NuBuild QA activities until QA responsibilities are transitioned to the operating organization under the direction of the Director, Oversight and Regulatory Affairs. This transition will occur after receipt of the COL and prior to 30 days before initial fuel load. The Manager NuBuild Quality Assurance has the authority to stop work to assure compliance with the QA Program. The Manager, NuBuild Quality Assurance has sufficient independence from other priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas necessary regarding CPNPP 3 and 4 activities. The Manager, NuBuild Quality Assurance may make recommendations to management regarding improving the quality of work processes. If the Manager, NuBuild Quality Assurance disagrees with any actions taken by the CPNPP 3 and 4 organization relative to QAPD implementation and is unable to obtain resolution, the Vice President, Nuclear Engineering and Support shall if necessary, bring the matter to the attention of the CNO who will determine the final disposition.

1.5.2 Director, Oversight and Regulatory Affairs

The Director, Oversight and Regulatory Affairs reports directly to the SVP&CNO and is responsible for the development and verification of implementation of the QAPD described in this document. The Director, Oversight and Regulatory Affairs is responsible for providing assistance as required, including technical interface between Nuclear Generation departments to assure consistency and compliance with CPNPP licensing commitments, and for providing liaison with government regulatory agencies. The Director, Oversight and Regulatory Affairs is also responsible for the definition, direction, maintenance, and measurement of the effectiveness of the QA Program for Nuclear Generation and other Luminant Power support activities, the independent verification of critical attributes associated with safety-related equipment or work activities and providing, when necessary, independent review and concurrence for quality-related activities such as procurement, nonconformance reporting, corrective action and other activities. The Director, Oversight and Regulatory Affairs directs the activities of the SAFETEAM Manager for matters of Safety Conscious Work Environment as well as those of the Corrective Action Program Manager. The Director, Oversight and Regulatory Affairs has the authority to stop work to assure compliance with the QA Program. The Director, Oversight and Regulatory Affairs has sufficient independence from other priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas necessary regarding CPNPP 3 and 4 activities. The Director, Oversight and Regulatory Affairs may make recommendations to management regarding improving the quality of work processes. If the Director, Oversight and Regulatory Affairs disagrees with any actions taken by the CPNPP 3 and 4 organization relative to QAPD implementation and is unable to obtain resolution, the Director, Oversight and Regulatory Affairs shall if necessary, bring the matter to the attention of the SVP&CNO who will determine the final disposition.

1.5.3 Manager, Quality Assurance

The Manager, Quality Assurance reports directly to the Director, Oversight and Regulatory Affairs, and is responsible for assuring compliance with regulatory requirements and procedures through audits and technical reviews; for monitoring organization processes to ensure conformance to commitments and licensing document requirements; and for ensuring that vendors providing quality services, parts and materials to CPNPP 3 and 4 are meeting the requirements of 10 CFR 50, Appendix B through Nuclear Procurement Issues Committee (NUPIC) or Luminant vendor audits.

1.6 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 off-site work performed by suppliers furnishing safety-related materials and services to Luminant.

1.7 Quality Assurance Organizational Independence

For CPNPP Units 3 and 4, 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.

1.8 NQA-1-1994 Commitment

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

Figure II.1
Luminant Organization

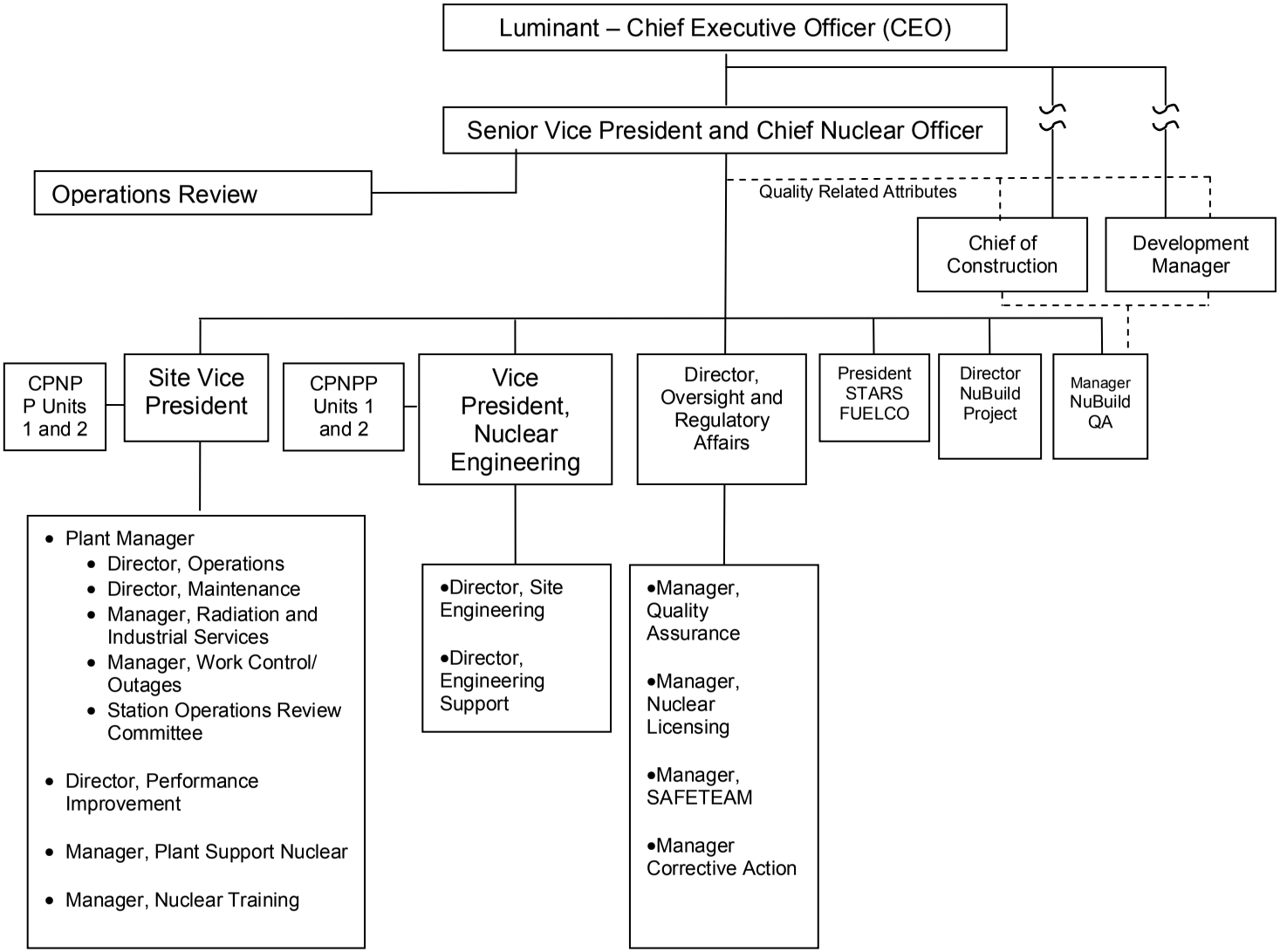


Figure II.2
CPNPP Units 3 and 4 Site Organization

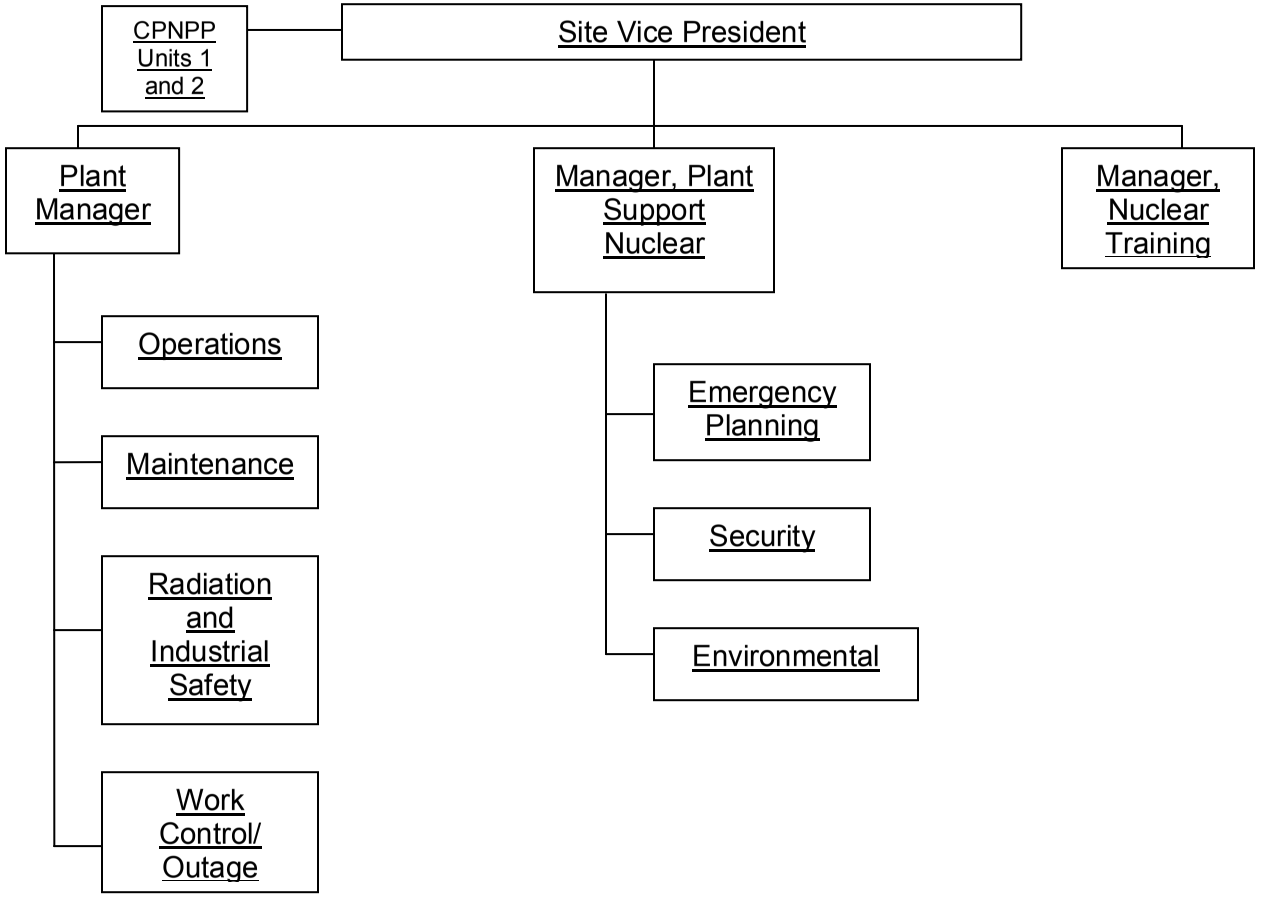
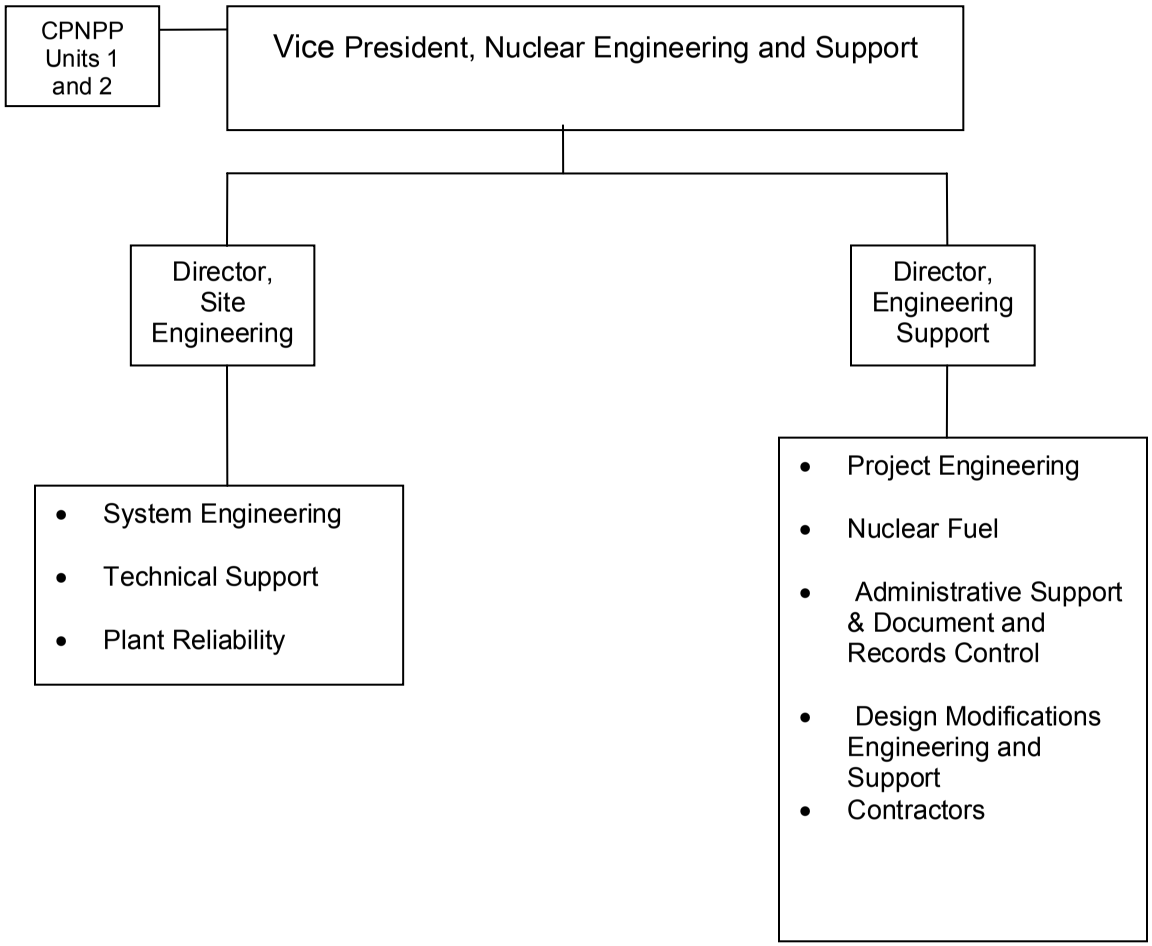


Figure II.3
CPNPP Units 3 and 4 Support Organization



SECTION 2 QUALITY ASSURANCE PROGRAM

Luminant has established the necessary measures and governing procedures to implement the QAP as described in the QAPD. Luminant is committed to implementing the QAP in all aspects of work that are important to the safety of the nuclear plants as described and to the extent delineated in the QAPD. Further, Luminant 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 the Part II, Section 18.

The objective of the QAP is to assure that CPNPP Units 3 and 4 are 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 structures, systems, and components (SSCs) associated with the design (excluding Design Certification activities), fabrication, construction, and testing of the SSCs of the facility and to the managerial and administrative controls to be used to assure safe operations. 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. Cost and scheduling functions do not prevent proper implementation of the QAP.

As described in Part III of this 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, provided that the supplier or principle contractor has been approved as a supplier in accordance with the QAPD. Periodic audits and assessments of supplier QA programs are performed to assure compliance with the supplier’s or principle contractor’s QAPD and implementing procedures. In addition, routine interfaces with the supplier’s personnel provide added assurance that quality expectations are met.

For the COL applications, the QAPD applies to those CPNPP 3 and 4 and Luminant 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 Luminant CEO of Construction with all matters relating to quality being the responsibility of the SVP/CNO. Detailed engineering specifications and construction procedures will be developed to implement the QAPD and contractor QA programs prior to commencement of construction activities.

In general, the program requirements specified herein are detailed in implementing procedures that are either Luminant implementing procedures, or supplier implementing procedures governed by a supplier quality assurance program.

A general 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 general 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. Audit schedules are based on the month in which the audit starts.

2.1 Responsibilities

Personnel who work directly or indirectly for Luminant are responsible for achieving acceptable quality in the work covered by the QAPD. This includes the activities delineated in Part I, Section 1.1. Luminant 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 Luminant manager responsible for Quality Assurance is responsible to verify that processes and procedures comply with QAPD and other applicable requirements, that such processes or procedures are implemented, and that management appropriately ensures compliance.

2.2 Delegation of Work

Luminant 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). Changes to the QAPD are evaluated by the Luminant manager responsible for Quality Assurance 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 Luminant manager responsible for Quality Assurance and approved by the SVP/CNO.

Regulations require that the Final Safety Analysis Report (FSAR) 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 references this 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 Luminant 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 Luminant 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 Luminant manager responsible for Quality Assurance and the Director Oversight and Regulatory Affairs 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 of the individuals responsible for planning, implementing, and maintaining the programs for 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, approved, and documented by senior management.

2.7 NQA-1-1994 Commitment / Exceptions

In establishing qualification and training programs, Luminant 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. Either or both of 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, Luminant 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 Luminant sites.

- 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 Luminant, 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

Luminant 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 Luminant 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 Luminant 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 Luminant design organization or by other organizations so authorized by Luminant.

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

3.1 Design Verification

Luminant 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 item's intended use.

Luminant 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

Luminant 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. Luminant 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 authorized personnel. 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 NSSS supplier, DC holder, 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

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

SECTION 4 PROCUREMENT DOCUMENT CONTROL

Luminant 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 the Luminant's 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, Luminant 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, Luminant 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, Luminant procurement documents may allow the supplier to work under the Luminant 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 Luminant 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

Luminant 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 QAPD 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

Luminant'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, Luminant commits to compliance with NQA-1-1994, Basic Requirement 5.

SECTION 6 DOCUMENT CONTROL

Luminant 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 organization responsible for quality verification 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 units as described in the FSAR are screened to identify those that require review by the Operations Review Committee (ORC) prior to implementation as described in Part V, Section 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 shall be clearly delineated in implementing procedures.

6.3 NQA-1-1994 Commitment

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

SECTION 7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

Luminant has established the necessary measures and governing procedures to control the procurement of items and services to assure conformance with specified requirements. Such control provide 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

Luminant 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, construction, and operations 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. Luminant may utilize audits conducted by outside organizations for supplier qualification provided that the scope and adequacy of the audits meet Luminant 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, Luminant 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

  — Luminant 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 Luminant units 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 Luminant 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 accrediting 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, Luminant considers documents that may be stored in approved electronic media under Luminant 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. Following completion of the construction period, sufficient as-built documentation will be turned over to Luminant to support operations. The Luminant 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 Luminant 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 Luminant documents to provide the necessary assurance an item will perform satisfactorily in service. The Luminant 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.

  - Luminant will also use other appropriate approved regulatory means and controls to support Luminant commercial grade dedication activities. Luminant will assume 10 CFR 21 reporting responsibility for all items that Luminant dedicates as safety-related.

SECTION 8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

Luminant 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, Luminant commits to compliance with NQA-1-1994, Basic Requirement 8 and Supplement 8S-1.

SECTION 9 CONTROL OF SPECIAL PROCESSES

Luminant 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, Luminant commits to compliance with NQA-1-1994, Basic Requirement 9 and Supplement 9S-1.

SECTION 10 INSPECTION

Luminant 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, as well as (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

Luminant has established qualification programs for personnel performing quality inspections. The qualification program requirements are described in Part II, Section 2. 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, Luminant commits to compliance with NQA-1-1994, Basic Requirement 10, Supplement 10S-1 and Subpart 2.4, with the following clarification. In addition, Luminant commits to compliance with the requirements of Subparts 2.5 and 2.8 for establishing appropriate inspection requirements.

- Subpart 2.4 commits Luminant to IEEE 336-1985. IEEE 336-1985 refers to IEEE 498-1985. Both IEEE 336 -1985 and IEEE 498-1985 use the definition of “Safety” from IEEE 603-1980. Luminant commits to the definition of Safety Systems in IEEE 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), Luminant may take exception to the requirements of NQA-1-1994, Supplement 10S-1, Section 3.1, when doing so the inspectors report to quality control management while performing those inspections.

SECTION 11 TEST CONTROL

Luminant 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 Technical Specifications), to demonstrate that 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, re-testing 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 2.

11.1 NQA-1-1994 Commitment

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

11.2 NQA-1-1994 Commitment for Computer Program Testing

Luminant 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 Luminant 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

Luminant 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, Luminant 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, Luminant 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

Luminant 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 the equipment. During the operational phase, Luminant 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, Luminant 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, Luminant commits to compliance with NQA-1-1994, Basic Requirement 13 and Supplement 13S-1. Luminant also commits, during the construction and operational phase of the plant, to compliance with the requirements of NQA-1-1994, Subpart 2.1, Subpart 2.2, and Subpart 3.2 Appendix 2.1 with the following clarifications and exceptions:

- NQA-1-1994, Subpart 2.1

  - Subpart 2.1, Section 3.1 and 3.2 establish criteria for classifying items into cleanness classes and requirements for each class. Instead of using the cleanness level system of Subpart 2.1, Luminant may establish cleanness requirements on a case-by-case basis, consistent with the other provisions of Subpart 2.1. Luminant 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, Luminant 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, Luminant 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 plants 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. Instead of the five-level zone designation, Luminant may base 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

Luminant 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, Luminant commits to compliance with NQA-1-1994, Basic Requirement 14.

SECTION 15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

Luminant 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 Luminant procedures, regulatory requirements, and industry standards.

15.1 Interface with the Reporting Program

Luminant has appropriate interfaces between the QAP for identification and control of nonconforming materials, parts, or components and the non-QA Reporting Program to satisfy the requirements of 10 CFR 52, 10 CFR 50.55(e) and/or 10 CFR 21 during design and construction and 10 CFR 21 during operations.

15.2 NQA-1-1994 Commitment

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

SECTION 16 CORRECTIVE ACTION

Luminant has established the necessary measures and governing procedures to promptly identify, control, document, classify and correct conditions adverse to quality. Luminant 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. Luminant 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, Luminant 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, Luminant may delegate specific responsibilities for corrective actions but Luminant maintains responsibility for the effectiveness of corrective action measures.

16.1 Interfacing with the Reporting Program

Luminant has appropriate interfaces between the QAP for corrective actions and the non-QA Reporting Program to satisfy the requirements of 10 CFR 52, 10 CFR 50.55, and / or 10 CFR 21 during design and construction, and 10 CFR 21 during operations.

16.2 NQA-1-1994 Commitment

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

SECTION 17 QUALITY ASSURANCE RECORDS

Luminant shall establish 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 Luminant 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. Records of activities for design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, start-up, operations, maintenance, modification, decommissioning, audits, and their retention times are defined in appropriate procedures. The records retention times are based on Regulatory Position C.2 and Table 1, of Regulatory Guide 1.28, Revision 3 for design, construction, and initial start-up. 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 optical disks for electronic records storage and retrieval systems, Luminant complies with the NRC guidance in Generic Letter 88-18, “Plant Record Storage on Optical Disks.” Luminant 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, Luminant 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 Luminant, 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

Luminant 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 CPNPP 3 and 4 activities, audits will focus on areas including, but not limited to 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 record keeping.

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 Luminant manager responsible for Quality Assurance.

Luminant 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 SVP/CNO or designee, as appropriate. 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 SVP/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, Luminant 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

The verification activities described in this part may be performed by the Luminant line organization. The QA organization described in Part II is not required to perform these functions.

1.2 QA Program

Luminant 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

Luminant 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 Luminant 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

Luminant 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

Luminant 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

Luminant 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

Luminant 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

Luminant 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

Luminant 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 may be performed by knowledgeable personnel in the line organization. Knowledgeable personnel are from the same discipline and have experience related to the work being inspected.

1.11 Test Control

Luminant 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)

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

1.13 Handling, Storage, and Shipping

Luminant 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

Luminant 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

Luminant 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

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

1.17 Records

Luminant 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

Luminant 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 criterion applies to fire protection (10 CFR 50.48), anticipated transients without scram (ATWS) (10 CFR 50.62), the station blackout (SBO) (10 CFR 50.63) SSCs that are not safety related:

- Luminant 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 FSAR Chapter 1 and 9.5.

- Luminant implements the quality requirements for ATWS equipment in accordance with Part III, Section 1.

- Luminant implements quality requirements for SBO equipment in accordance with Part III, Section 1.

PART IV REGULATORY COMMITMENTS

NRC Regulatory Guides and Quality Assurance Standards

This section identifies the NRC Regulatory Guides (RG) and the other quality assurance standards, which have been selected to supplement and support the Luminant QAPD. Luminant complies with these standards to the extent described or referenced. Commitment to a particular RG or standard does not constitute a commitment to other RGs or standards that may be referenced therein.

Regulatory Guides:
See FSAR Chapter 1 for the Luminant evaluation of conformance with the guidance in NRC Regulatory Guides in effect six months prior to the submittal date of the application.

Regulatory Guide 1.8, Revision 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.

Luminant identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in the text below:

This regulatory guide endorses ANSI/ANS-3.1-1993, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," with certain additions and exceptions that are listed in the regulatory position of this guide. Rather than commit to those Standards in the QAPD, appropriate requirements have been directly incorporated into the text if not found in NQA-1-1994. These requirements are consistent with the identified acceptance criteria in SRP Section 17.5.

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

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.

Luminant identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1.

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 with regard to establishing and implementing the requisite quality assurance program for the design and construction of nuclear power plants.

Luminant identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in the text below:

- This regulatory guide endorses the basic and supplementary requirements in ANSI/ASME NQA-1-1983, "Quality Assurance Program Requirements for Nuclear Power Plants" and the ANSI/ASME NQA-1a-1983 Addenda along with the regulatory positions discussed below for the establishment and execution of quality assurance programs during the design and construction phases of nuclear power plants. The Luminant QAPD provides adequate guidance for establishing a quality assurance program that complies with Appendix B to 10 CFR Part 50 by conformance with ASME NQA standard NQA-1-1994, as supplemented by additional regulatory guidance and industry guidance in lieu of the 1983 Edition as clarified in Parts II, IV, and V.

- Regulatory Position C.1 addresses the qualification of inspection and test personnel. The Luminant QAPD provides an alternative to this position and conforms to these requirements as clarified in Part II, Section 2.7.

- Regulatory Position C.2 addresses quality assurance records. Luminant conforms with 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. Luminant conforms with 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).

Luminant identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1.

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 operation phase of nuclear power plants.

Luminant identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in the text below:

- 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, Luminant conforms with 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, Luminant 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.

- In meeting the intent of Regulatory Position C.2, Luminant conforms with Regulatory Guides governing QA as specified in Parts II, IV, and V.

- In meeting the intent of Regulatory Position C.3, Luminant describes the requirements for independent review of technical specification changes and license amendments in Part V, Section 2.2.

- In meeting the intent of Regulatory Position C.4, Luminant describes the internal audit function, scheduling, and frequency in Part II, Section 18.

- In meeting the intent of Regulatory Position C.5, Luminant 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.

Luminant identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide 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 for the application of protective coatings within nuclear power plants to protect surfaces from corrosion, contamination from radionuclides, and for wear protection.

Luminant identifies conformance and exceptions for the applicable regulatory guidance provided in this regulatory guide in FSAR Chapter 1. In Table 1.9-201, Luminant identifies one exception where ASTM standard revision levels may differ from Regulatory Guide 1.54 in order to apply updated guidance when it becomes available.

Standards:

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

Luminant commits to NQA-1-1994, Parts I, II and III, as described in Parts II and V of this document.

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

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

PART V ADDITIONAL QUALITY ASSURANCE AND ADMINISTRATIVE CONTROLS FOR THE PLANT OPERATIONAL PHASE

Luminant 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

Luminant 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

independent review: 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)

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 Luminant 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 Plant Manager. 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 Plant Manager 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 Plant Manager 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 function performs the following:

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

b. Reviews proposed tests and experiments not described in the SAR prior to implementation. Verifies the determination of whether changes to proposed tests and experiments not described in the SAR require a technical specification change or license amendment..

c. 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.

d. 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.

e. Reviews any matter related to nuclear safety that is requested by the SVP&CNO.

f. Reviews corrective actions for significant conditions adverse to quality.

g. Reviews internal audit reports.

g. Reviews the adequacy of the internal audit program every 24 months.

2.2.1 Operations Review Committee

1. An ORC is assigned independent review responsibilities.

2. The ORC reports to SVP & CNO.

3. The ORC 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.

4. During the period of initial operation, meetings are conducted no less frequently than once per calendar quarter. Afterwards meetings are conduced no less than twice a year.

5. Results of the meeting are documented and recorded.

6. Consultants and contractors are used for the review of complex problems beyond the expertise of the off site/on site independent review committee.

7. Persons on the ORC are qualified as follows:

   a. Supervisor or Chairman of the Operations Review Committee

      - Education: baccalaureate in engineering or related science

      - Minimum experience: 6 years combined managerial and technical support

   b. Operations Review Committee members

      Education: Baccalaureate in engineering or related science for those Independent review personnel 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 independent review personnel who are required to review problems in administrative control and quality assurance practices, training, and emergency plans and related procedures and equipment.

Minimum experience: 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).

SECTION 3 Operational Phase Procedures

The following is a description of the various types of procedures used by Luminant to govern the design, operation, and maintenance of its nuclear generating plants. Luminant 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. Actions to correct off-normal conditions 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. 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 a reactor trip, 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 a reactor trip 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, 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 are taken in response. Format and content of emergency procedures are based on NUREG and Owner's Group(s) guidance that identify potential emergency conditions and require such procedures to include, as appropriate, 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, Luminant 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

Luminant establishes controls for the maintenance or modification of items and equipment subject to this 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, Luminant 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 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.